



June 9, 2015

Ms. Colleen Casey  
U. S. Nuclear Regulatory Commission  
Region III  
Materials Licensing Branch  
2443 Warrenville Road, Suite 210  
Lisle, Illinois 60532

**NRC License # 24-01090-03: Request to amend license to change RSO from Duane Myers, MD to Samuel Rhoades, Ph.D. with needed documentation to include 35.300 category.**

Dear Colleen:

On June 3, 2015 we had a telephone conversation where you informed Mercy of our deficiency in documentation for Dr. Samuel Rhoades, Ph.D. to become the RSO at Mercy Hospital Joplin as requested in our last amendment request.

Thank you for your patience and guidance directing us to the appropriate forms and the most expedient way to rectify the problem. It is appreciated by all of here at Mercy.

Attached are the requested documents attesting to the training of Dr. Rhoades by Dr. Myers.

If you have any questions regarding this, please contact me directly at (417) 556-2937 or by email, at your convenience.

Sincerely,

A handwritten signature in cursive script that reads "Whit Sanders".

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Whit Sanders, Director of Cancer Services

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE  
AND PRECEPTOR ATTESTATION  
[10 CFR 35.50]**

APPROVED BY OMB: NO. 3150-0120  
EXPIRES: (05/31/2015)

Name of Proposed Radiation Safety Officer

Samuel Rhoades, PhD

Requested Authorization(s) *The license authorizes the following medical uses (check all that apply):*

- 35.100   
  35.200   
  35.300   
  35.400   
  35.500   
  35.600 (remote afterloader)  
 35.600 (teletherapy)   
  35.600 (gamma stereotactic radiosurgery)   
  35.1000 ( \_\_\_\_\_ )

**PART I -- TRAINING AND EXPERIENCE**  
(Select one of the four methods below)

\*Training and Experience, including board certification, must have been obtained within the 7 years preceding the date of application or the individual must have obtained related continuing education and experience since the required training and experience was completed. Provide dates, duration, and description of continuing education and experience related to the uses checked above.

**1. Board Certification**

- a. Provide a copy of the board certification.
- b. Use Table 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.
- c. Skip to and complete Part II Preceptor Attestation.

OR

**2. Current Radiation Safety Officer Seeking Authorization to Be Recognized as a Radiation Safety Officer for the Additional Medical Uses Checked Above**

- a. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for the additional types of medical use for which recognition as RSO is sought.
- b. Skip to and complete Part II Preceptor Attestation.

OR

**3. Structured Educational Program for Proposed Radiation Safety Officer**

a. Classroom and Laboratory Training

| Description of Training  | Location of Training | Clock Hours          | Dates of Training* |
|--|----------------------|----------------------|--------------------|
| Radiation physics and instrumentation                              |                      |                      |                    |
| Radiation protection   |                      |                      |                    |
| Mathematics pertaining to the use and measurement of radioactivity |                      |                      |                    |
| Radiation biology  |                      |                      |                    |
| Radiation dosimetry  |                      |                      |                    |
| <b>Total Hours of Training:</b>                                    |                      | <input type="text"/> |                    |

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

**3. Structured Educational Program for Proposed Radiation Safety Officer (continued)**

b. Supervised Radiation Safety Experience (continued)

*(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)*

|   |  |
|---|--|
| Supervising Individual  | License/Permit Number listing supervising individual as a Radiation Safety Officer |
| This license authorizes the following medical uses:               |  |
| <input type="checkbox"/> 35.100                                   | <input type="checkbox"/> 35.200  |
| <input type="checkbox"/> 35.500                                   | <input type="checkbox"/> 35.600 (remote afterloader)                               |
| <input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery) | <input type="checkbox"/> 35.1000 ( _____ )   |
| <input type="checkbox"/> 35.300                                   | <input type="checkbox"/> 35.400  |
|   | <input type="checkbox"/> 35.600 (teletherapy)                                      |

c. Describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.

| Description of Training   | Training Provided By | Dates of Training* |
|---|----------------------|--------------------|
| Radiation safety, regulatory issues, and emergency procedures for 35.100, 35.200, and 35.500 uses               |                      |                    |
| Radiation safety, regulatory issues, and emergency procedures for 35.300 uses                                   | Duane Myers, MD      | 6/8/15             |
| Radiation safety, regulatory issues, and emergency procedures for 35.400 uses                                   |                      |                    |
| Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses                     |                      |                    |
| Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses              |                      |                    |
| Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses |                      |                    |
| Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):                      |                      |                    |

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

**3. Structured Educational Program for Proposed Radiation Safety Officer (continued)**

c. Training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license (continued)

Supervising Individual *If training was provided by supervising RSO, AU, AMP, or ANP. (If more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.)*

License/Permit Number listing supervising individual

24-01090-03

Duane Myers, MD

License/Permit lists supervising individual as:

- Radiation Safety Officer       Authorized User       Authorized Nuclear Pharmacist
- Authorized Medical Physicist

Authorized as RSO, AU, ANP, or AMP for the following medical uses:

- 35.100       35.200       35.300       35.400
- 35.500       35.600 (remote afterloader)       35.600 (teletherapy)
- 35.600 (gamma stereotactic radiosurgery)       35.1000 ( \_\_\_\_\_ )

d. Skip to and complete Part II Preceptor Attestation.

**OR**

**4. Authorized User, Authorized Medical Physicist, or Authorized Nuclear Pharmacist identified on the licensee's license**

- a. Provide license number.
- b. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.
- c. Skip to and complete Part II Preceptor Attestation.

**PART II – PRECEPTOR ATTESTATION**

Note: This part must be completed by the individual's preceptor. The preceptor does not have to be the supervising individual as long as the preceptor provides, directs, or verifies training and experience required. If more than one preceptor is necessary to document experience, obtain a separate preceptor statement from each.

**First Section**

Check one of the following:

**1. Board Certification**

I attest that \_\_\_\_\_ has satisfactorily completed the requirements in  
Name of Proposed Radiation Safety Officer

10 CFR 35.50(a)(1)(i) and (a)(1)(ii); or 35.50 (a)(2)(i) and (a)(2)(ii); or 35.50(c)(1).

**OR**

**2. Structured Educational Program for Proposed Radiation Safety Officers**

I attest that Samuel Rhoades, PhD has satisfactorily completed a structural educational  
Name of Proposed Radiation Safety Officer

program consisting of both 200 hours of classroom and laboratory training and one year of full-time radiation safety experience as required by 10 CFR 35.50(b)(1).

**OR**

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

**Preceptor Attestation (continued)**

**First Section (continued)**  
Check one of the following:

**3. Additional Authorization as Radiation Safety Officer**

I attest that \_\_\_\_\_ is an

Name of Proposed Radiation Safety Officer

Authorized User

Authorized Nuclear Pharmacist

Authorized Medical Physicist

identified on the Licensees license and has experience with the radiation safety aspects of similar type of use of byproduct material for which the individual has Radiation Safety Officer responsibilities

**AND**

**Second Section**

Complete for all (check all that apply):

I attest that Samuel Rhoades, PhD \_\_\_\_\_ has training in the radiation safety, regulatory issues, and

Name of Proposed Radiation Safety Officer

emergency procedures for the following types of use:

35.100

35.200

35.300 oral administration of less than or equal to 33 millicuries of sodium iodide I-131, for which a written directive is required

35.300 oral administration of greater than 33 millicuries of sodium iodide I-131

35.300 parenteral administration of any beta-emitter, or a photon-emitting radionuclide with a photon energy less than 150 keV for which a written directive is required

35.300 parenteral administration of any other radionuclide for which a written directive is required

35.400

35.500

35.600 remote afterloader units

35.600 teletherapy units

35.600 gamma stereotactic radiosurgery units

35.1000 emerging technologies, including:

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

AND

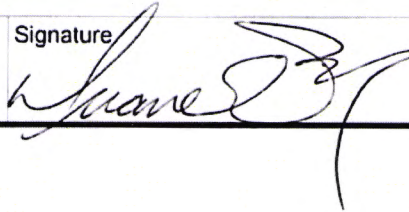
Third Section  
Complete for ALL

I attest that Samuel Rhoades, PhD has achieved a level of radiation safety knowledge  
Name of Proposed Radiation Safety Officer  
sufficient to function independently as a Radiation Safety Officer for a medical use licensee.

Fourth Section  
Complete the following for Preceptor Attestation and signature

I am the Radiation Safety Officer for Mercy Hospital Joplin  
Name of Facility

License/Permit Number: 24-01090-03

| Name of Preceptor | Signature   | Telephone Number | Date   |
|-------------------|---|------------------|--------|
| Duane Myers, MD   |  | 4175562839       | 6/9/15 |

## Casey, Colleen

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**From:** Sanders, Whit <Jonathan.Sanders@Mercy.Net>  
**Sent:** Tuesday, June 09, 2015 6:46 PM  
**To:** Casey, Colleen  
**Cc:** Sanders, Whit; Rhoades, Samuel J  
**Subject:** Mercy Joplin RAM license amendment for RSO change  
**Attachments:** image2015-06-09-190557.pdf; image2015-06-09-171026.pdf

Colleen,

First let me thank you for allowing us to provide the needed documentation to transition Dr Rhoades to RSO on our license. It is very much appreciated.

Please find attached the documents requested to allow the change in RSO to occur.

- 1) The attestation document from Duane Myers, MD for part 35.300 for Dr. Rhoades
- 2) The letter from me as the administrator requesting the amendment be completed

If there is anything else that you need from our facility please do not hesitate to contact be directly either by email, phone or at my mobile number – all oOf them are in my signature block.

Again thank you for your patience and assistance.

Whit

### PLEASE NOTE NEW PHONE NUMBERS

**Whit Sanders, MBA, RTT**  
Director Cancer Services, Nuclear Medicine,  
Cancer Registry & Research  
Mercy Hospital Joplin  
100 Mercy Way | Joplin, MO. 64804  
Office: 417-556-2937 | Mobile: 417-437-2337  
[whit.sanders@mercy.net](mailto:whit.sanders@mercy.net)

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**From:** Casey, Colleen [<mailto:Colleen.Casey@nrc.gov>]  
**Sent:** Wednesday, June 03, 2015 4:33 PM  
**To:** Sanders, Whit  
**Subject:** Test message; signature block

Dear Mr. Sanders,

Here is all the information you might need to respond to the deficiency on Dr. Rhoades. Thanks very much for your time today.

Please call me “Colleen.” Thanks.

*Colleen*

Colleen Carol Casey  
Materials Licensing Reviewer  
U.S. Nuclear Regulatory Commission  
Region III

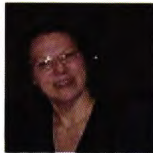
2443 Warrenville Road  
Suite 210  
Lisle, IL 60532-4352  
(630) 829-9841 Direct  
(630) 515-1078 Fax  
*NRC 24 HR Operations Center*  
(301) 816-5100

Gentle Reminders: Unless previously arranged with or requested by me directly, please do not submit any licensing requests, responses or correspondence via e-mail. Please only submit one complete, signed copy of your correspondence to us. Please prepare your licensing requests in accordance with NUREG 1556 Series Guidance, as appropriate. Thank you very much!

Please also note that my full-time work schedule includes every other Friday off.

Ensuring the health and safety of  
our people, our nation and  
our environment

<http://www.nrc.gov/>



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