UNIFORMED SERVICES UNIVERSITY OF THE HEALTH SCIENCES
4301 JONES BRIDGE ROAD
BETHESDA, MARYLAND 20814-4712
http://www.usuhs.mil

OFFICE OF THE
PRESIDENT
(301) 295-3013

Br.2

6 October 2015

Licensing Assistance Team
Division of Nuclear Material Safety
U.S. Nuclear Regulatory Commission, Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

Re: USNRC Licenses 19-23344-01 and 19-23344-02, Change in Radiation Safety Officer
03020175 03032810

Dear Sir or Madam,

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of a change in the Radiation Safety Officer (RSO) at the Uniformed Services University of the Health Sciences (USU).

As of July 15, 2015, Major Kimberly D. Alston, USA, has assumed the position of Radiation Safety Officer for the Type A Broad scope (19-23344-01) and Self-shielded Irradiator (19-23344-02) NRC licenses at USU. Major Alston is listed as the RSO on the Type A Broad scope (19-23344-01) license renewal application dated July 20, 2015. Major Alston has previously served as the RSO on an NRC Byproduct Materials License and a copy of her NRC Form 313a and Curriculum Vitae are provided for your review.

Sincerely,

Charles L. Rice, MD
President

Enclosures:
As stated

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17 July 2015

MEMORANDUM FOR ALL USUHS PERSONNEL

SUBJECT: Authority of the Radiation Safety Officer

MAJ Kimberly D. Alston, USA, Deputy Director for Environmental Health and Safety, has been appointed as Radiation Safety Officer, effective 20 July 2015. She is responsible for ensuring the safe use of radioactive materials at this institution. The Radiation Safety Officer is responsible for managing the Radiation Safety Program; identifying radiation safety problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; and ensuring compliance with regulations. The Radiation Safety Officer is hereby delegated the authority to meet these responsibilities.

When an unsafe use or condition involving radioactive materials is brought to the attention of the Radiation Safety Officer, she shall have the authority to immediately stop usage of the radioactive materials. Final disposition of the problem will be the responsibility of the Radiation Safety Committee.

The Radiation Safety Officer is also responsible for assisting the Radiation Safety Committee in the performance of its duties and serving as its Executive Secretary.

Charles L. Rice, MD
President

Attachments:
As stated

cc:
Col Lester Huff
Mr. John Pomerville

NRC FORM 313A (RSO) (05-2012) U.S. NUCLEAR REGULATORY COMMISSION

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

Kimberly Alston

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	San Diego State University, San Diego, CA ORAU Applied Health Physics Course	110 50	[redacted]
Radiation protection	San Diego State University, San Diego, CA ORAU Applied Health Physics Course	120 30	[redacted]
Mathematics pertaining to the use and measurement of radioactivity	San Diego State University, San Diego, CA ORAU Applied Health Physics Course	100 45	[redacted]
Radiation biology	San Diego State University, San Diego, CA AFRRI MEIR Course, Bethesda, MD	40 14	[redacted]
Radiation dosimetry	San Diego State University, San Diego, CA ORAU Applied Health Physics Course	30 15	[redacted]
	Total Hours of Training:	554	

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

Description of Experience	Location of Training/ License or Permit Number of Facility	Dates of Training*
Shipping, receiving, and performing related radiation surveys	Walter Reed Army Med Ctr, Wash DC# 08-01738-02/03 Martin Army Hosp, Ft Benning GA# 10-06493-02 Def Packaging of HAZMAT for Trans, APG, MD	1999-2003 2003-2006 2007
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides	Walter Reed Army Med Ctr, Wash DC# 08-01738-02/03 Martin Army Hosp, Ft Benning GA# 10-06493-02 Rad Samp Analysis, Instr & Methods, Albuquerque, NM	1999-2003 2003-2006 2010
Securing and controlling byproduct material	Walter Reed Army Med Ctr, Wash DC# 08-01738-02/03 Martin Army Hosp, Ft Benning GA# 10-06493-02	1999-2003 2003-2006
Using administrative controls to avoid mistakes in administration of byproduct material	Walter Reed Army Med Ctr, Wash DC# 08-01738-02/03 Martin Army Hosp, Ft Benning GA# 10-06493-02	1999-2003 2003-2006
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures	Walter Reed Army Med Ctr, Wash DC# 08-01738-02/03 Martin Army Hosp, Ft Benning GA# 10-06493-02	1999-2003 2003-2006
Using emergency procedures to control byproduct material	Walter Reed Army Med Ctr, Wash DC# 08-01738-02/03 Martin Army Hosp, Ft Benning GA# 10-06493-02	1999-2003 2003-2006
Disposing of byproduct material	Walter Reed Army Med Ctr, Wash DC# 08-01738-02/03 Martin Army Hosp, Ft Benning GA# 10-06493-02	1999-2003 2003-2006
Licensed Material Used (e.g., 35.100, 35.200, etc.)+	35.100, 35.200, 35.300, 35.500	1999-2006

\+ Choose all applicable sections of 10 CFR Part 35 to describe radioisotopes and quantities used: 35.100, 35.200, 35.300, 35.400, 35.500, 35.600 remote afterloader units, 35.600 teletherapy units, 35.600 gamma stereotactic radiosurgery units, emerging technologies (provide list of devices).

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:

☐ 35.100 ☐ 35.200 ☐ 35.300 ☐ 35.400
☐ 35.500 ☐ 35.600 (remote afterloader) ☐ 35.600 (teletherapy)
☐ 35.600 (gamma stereotactic radiosurgery) ☐ 35.1000 (_____)

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		
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

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 _____ 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 _____ 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 _____ 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 _____
Name of Facility

License/Permit Number: _____

Name of Preceptor	Signature	Telephone Number	Date

Curriculum Vitae

Kimberly D. Alston
Major, Medical Service Corps

I have worked in the Health Physics field for over 16 years. I worked as a Health Physics Technician for the first four years of my career and have served as a Health Physicist for the last 12+ years. Experiences include: Chief, Health Physics Section, Army Medical Department Center and School; Health Physicist supporting the U.S. sole national asset Army Nuclear Disablement Teams during exploitation, elimination, and nuclear forensics missions; RSO in Kuwait conducting radiation survey operations on equipment, commodities, and vehicles containing radioactive material staged for retrograde; U.S radiological advisor to NATO CBRN Medical Working Group and secretary for the Medical Liaison Team; RSO and NRC license holder responsible for Martin Army Community Hospital; nuclear medicine management; and instrumentation surveys of X-ray and Fluoroscopy systems.

PERSONAL INFORMATION

Professional Address-current

AMEDD Center and School
3599 Winfield Scott Road
JBSA-FSH, TX 78234
210-221-6011

(a/o July 2015)
Uniformed Services University of the Health Sciences
EHS, Room A2020
4301 Jones Bridge Road
Bethesda, Maryland 20814
301-295-3390

Email Address: kimberly.d.alston.mil@mail.mil

PRESENT POSITION

Chief, Health Physics Section
CBRN Sciences Branch
AMEDDC&S

Chief, Radiation Safety Division (a/o July 2015)
Uniformed Services University of the Health Sciences

EDUCATION

Civilian

Graduate: MS, San Diego State University
MPH, Walden University,
Undergraduate: BS, Chemistry, Xavier University of Louisiana, [redacted]

Nuclear Infrastructure Assessment and Disablement Course	2010
Radioactive Sample Analysis	2010
Nuclear Fuel Cycle Operations Course	2009
ORAU Applied Health Physics Course	2008

Military

Joint Medical Operations Course	2015
Defense Support of Civil Authorities	2013
Public Health Emergency Management	2013
Instructor Training Course	2012
Support Cadre Training Course	2012
Defense Packaging of HAZMAT for Transportation	2007
Captains Career Course	2006
Laser and Radiofrequency Course	2005
Deployment Health Physics Course	2004
Principles of Military Preventive Medicine Course	2004
Basic Industrial Hygiene Course	2004
Officer Basic Course	2003
Medical Effects of Ionizing Radiation	2000
Health Physics Specialist Course	1999

MILITARY ASSIGNMENTS

Chief, Health Physics Section/Senior Instructor 2012-present
CBRN Sciences Branch, AMEDD Center and School, Fort Sam Houston, TX

Nuclear Disablement Team (NDT) Health Physicist 2009-2010
20th SUPCOM (CBRNE) APG, MD

Deputy Surgeon 2008 - 2009
20th SUPCOM (CBRNE), APG, MD

Radiation Safety Officer, Camp Arifjan, Kuwait 2007 - 2008
Army Contaminated Equipment Retrograde Team (ACERT)

Radiation Operations Officer 2006 - 2007
Health Physics Program, USACHPPM, APG, MD

Chief, Health Physics Office/Radiation Safety Officer 2003-2006
Martin Army Community Hospital, Fort Benning, GA (NRC License 10-06493-02)

Health Physics Specialist/Assistant RSO 1999-2003
Walter Reed Army Medical Center, RSO: COL William B. Johnson/LTC John R. Mercier (NRC License 08-01738-02/03)

APPOINTMENTS

Adjunct Faculty Texas A&M University 2013-2015
School of Rural Public Health

Adjunct Faculty San Diego State University 2013-2015
College of Sciences

PROFESSIONAL MEMBERSHIPS

Health Physics Society

PUBLICATIONS

Chapter 3, "Radiological Hazards" *The Medical CBRN Battlebook, Technical Guide 244*. U.S. Army Center for Health Promotion and Preventive Medicine, October 2008.

Detection, Modeling, and Assessment of Radiological Conditions: An Analysis of a Radiological Preparedness Program, San Diego State University Publication, September 2012.

TRAINING AND RADIOISOTOPE EXPERIENCE

Training

Training and experience at Walter Reed Army Medical Center (Broadscope NRC License # 08-01738-02/03) was under the supervision of LTC John Mercier, Ph.D, Chief of Health Physics/Radiation Safety Officer. Training included: radioactive waste management, radiation safety procedures, dosimetry, shipping and receiving, radioactive material handling, patient therapy support and emergency response procedures.

Experience at Martin Army Community Hospital (NRC License 10-06493-02) included: NRC License management and administration, radiation safety procedures, radioactive waste management, QC of nuclear medicine diagnostic studies, emergency response procedures.

Training and experience at USACHPPM (NRC License # SMB-707 and 19-09880-01) was under supervision of Ms. Bethany Hope-Webb, RSO. Training included dosimetry, radiation safety procedures, and operational health physics.

Training and experience at 20th Support Command, Nuclear Disablement Team (NDT) was under the supervision of COL William Argo (NDT Team Chief), and Mr. Sheldon Orr, RSO in conjunction with Idaho and Oak Ridge National Laboratories. Training included: nuclear fuel cycle operations, nuclear forensics, operational health physics, radiation safety procedures, and emergency response.

Training and experience at San Diego State University was under the supervision of Dr. Patrick Papin, Associate Dean of College and Sciences, and Dr. Usha Sinha, Chair, Physics Department and Director of Radiological Physics Program. Training included: health and nuclear physics and instrumentation, medical physics, and emergency response.

Category A: Principles and Practices of Radiation Protection
Category B: Radioactivity Measurement Standardization and Monitoring
Category C: Mathematics and Calculations Basic to the Use and Measurement of Radioactivity
Category D: Biological Effects of Radiation
Category E: Radioactive Waste Disposal

CATEGORY	LOCATION OF TRAINING	DATE/DURATION	TYPE OF TRAINING
A,B,C,D,E	AMEDDC&S, FSH, TX	Apr-Aug 1999	Classes
A,B,C,D,E	Walter Reed Army Medical Center, Washington , DC	Aug 1999-Jan 2003	Classes & on the job
A,B,C,D,E	Martin Army Community Hospital, Fort Benning, GA	Jan 2003-Jun 2006	Classes & on the job
A,B,C,D	USACHPPM, APG, MD	Jun 2006-Apr 2008	Classes & on the job
A,B,C,D,	20th Support Command, APG, MD	Apr 2008-Sep 2010	Classes & on the job
A,B,C,D,	San Diego State University	[redacted]	Classes
A,B,C,D,	AMEDDC&S, Fort Sam Houston, TX	Sept 2012-June 2015	On the job

Experience with Isotopes

ISOTOPE	MAXIMUM ACTIVITY/QUANTITY	DURATION OF EXPERIENCE	TYPE OF EXPERIENCE
Atomic Nos 1-84	25 Curies total	1999-2003 2006-2008	Laboratory oversight
Atomic Nos 85 -100	15 millicuries total	2006-2008	Laboratory oversight
H- 3	Curie amounts	1999-2003	Laboratory oversight
C-14	Curie amounts	1999-2003	Laboratory oversight
P-32	Curie amounts	1999-2003	Laboratory oversight
Xe-33	Curie amounts	1999-2003	Laboratory oversight
S-35	Curie amounts	1999-2003	Laboratory oversight
Co-60	Multi-Curie Sealed Sources	1999-2003	Laboratory oversight
Co-60	25,000 Curies	1999-2003	Irradiator
Tc-99m	1 millicurie	2012-2015	Contamination Control exercise
Pd-103	Multi-Curie Sealed Sources	1999-2003	Laboratory oversight
I-125	Curie amounts	1999-2003	Laboratory oversight
1-131	Curie amounts	1999-2003	Patient therapy support and Laboratory oversight
I-131	300 millicuries	2003-2006	Nuclear Medicine imaging and localizations studies QC

ISOTOPE	MAXIMUM ACTIVITY/QUANTITY	DURATION OF EXPERIENCE	TYPE OF EXPERIENCE
Cs-137	25,000 Ci	1999-2003	Irradiator
Gd-153	Multi-Curie Sealed Sources	1999-2003	Laboratory oversight
Ir-192	Multi-Curie Sealed Sources	1999-2003	Patient therapy support and Laboratory oversight
Am-241	Multi-Curie Sealed Sources	1999-2003	Laboratory oversight
Am-241	Exempt quantity sealed sources	2012-2015	Instruction and demonstration, instrument calibration, reference standards
Plutonium – sealed neutron sources	208 grams	2006-2010	Field training exercises/Instrument calibration/Sample analysis
Depleted Uranium	230 kilograms	2006-2010	Field training exercises/Sample analysis
Natural Uranium	50 kilograms	2006-2010	Field training exercises/Instrument calibration/Sample analysis

This is to acknowledge the receipt of your letter/application dated 10/06/2015, and to inform you that the initial processing which includes an administrative review has been performed.

19-23341-01
19-23341-02 } amendment

[X] There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

[ ] Please provide to this office within 30 days of your receipt of this card

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A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 589193/589199
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI)
(6-96)

Sincerely,
Licensing Assistance Team Leader