

November 25, 2015

U.S. NRC, Region I 2100 Renaissance Blvd. King of Prussia, PA 19406

RE: mail control number 588935

Materials License #06-16624-01, Johnson Memorial Medical Center

Ms. Farrah Gaskins,

- 1. You will be named Radiation Safety Officer (RSO) on the license. Since you are an outside consultant\contractor, in support of this request, please address the following:
- a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.

The RSO reports to the JMMC Radiation safety Committee (RSC) and derives his authority directly from the RSC. Under the direction of the RSC, the RSO will have authority to implement corrective actions he deems necessary to ensure compliance with regulations, license conditions, and the facility's stated ALARA directive. Any disputes or concerns regarding the RSO's decisions or actions will be presented to the RSC for resolution.

b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.

At least one member of management will be a member of the RSC. This management member will be responsible for ensuring that the RSO has access to sufficient funds to maintain the radiation safety program and will budget to that effect.

c. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).

The RSO will commit 8 hours per month on-site to the JMMC license and its covered facilities. The specific RSO, Mr. Gregory Hisel, also currently has commitments to other area license facilities including hospitals and nuclear pharmacies. These commitments will not interfere with the 8 hours per month commitment to the JMMC radiation safety program.

d. Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.

In the RSO's absence, Dr. Tiffany Dube will be the primary point of contact for radiation safety issues.

e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.

The RSO currently lives within 10 miles of the facility, and will typically be able to respond to emergencies same day. Also, the RSO is employed through a regional radiological physics consultant group, Upstate Medical Physics. Upstate Medical Physics also has several other ABR, AMP and ABHP certified physicists on staff that would be able to respond in the event of an emergency at JMMC and the RSO was not available to respond.

 You requested Mozafareddin Karemeddini, M.D. to be added to the license as an authorized user for In-Vitro Studies. Please note that this license does not authorize In-Vitro Studies and we cannot grant this authorization for Dr. Karemeddini.

This is correct. In-Vitro studies are not part of the JMMC program.

If you have any questions or need further information, please contact Mr. Gregory Hisel, radiation safety officer, at 518-755-7465.

Sincerely,

Stuart E. Rosenberg

President and CEO

Johnson Memorial Medical Center

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