



16001 West Nine Mile Road  
Southfield, MI 48075

December 16, 2015

UNITES STATES NUCLEAR REGULATORY COMMISSION  
Region III, Materials Licensing Section  
2443 Warrienville Road, Suite 210  
Lisle, IL 60532-4352

Re: Amendment to License No. 21-02802-03

1. Please remove John F.K. Brown, M.D. as the Radiation Safety Officer. Dr. Brown will be remaining as an Authorized User on this license.
2. Please add Daniel Wale, D.O. as the Radiation Safety Officer. A copy of the NRC313A(RSO) form and RSO Agreement letter is enclosed for your review.

Thank you for your cooperation with this matter. If you have any question please contact our physicist, Michelle Kritzman, at (734) 662-3197 or by email at [mkritzman@mpcphysics.com](mailto:mkritzman@mpcphysics.com)

Sincerely,

A handwritten signature in black ink, appearing to read 'Michelle Kritzman'.

Administrator  
Providence Hospital  
Southfield, Michigan



RECEIVED JAN 27 2016

**RSO / EXECUTIVE MANAGEMENT  
LETTER OF UNDERSTANDING**

December 16, 2015

Daniel Wale, D.O.  
Radiation Safety Officer  
16001 W. Nine Mile Road  
Southfield, MI 48037

Re: Radiation Safety Officer / Executive Management  
Letter of Understanding

Dear Dr. Wale,

You have been appointed the Radiation Safety Officer (RSO) of this facility for our United States Nuclear Regulatory Commission Materials License. This "Letter of Understanding" is prepared to comply with Title 10 Code of Federal Regulations (CFR) Part 35.24(b). This section of the regulations requires that you agree in writing to the following:

- Assume responsibility for implementing the Radiation Protection Program
- Ensure that radiation safety activities are being performed in accordance with our own approved procedures and all regulatory requirements.

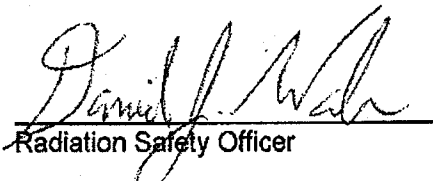
Furthermore, in compliance with 10 CFR 35.24(e),(g), the executive management of this facility agrees to provide you as RSO:

- Specific written notation of your authority, duties and responsibilities, see attached.
- Sufficient authority, organizational freedom, time, resources and management prerogative to:
  1. Identify radiation safety problems;
  2. Initiate, recommend, or provide corrective actions;
  3. Stop unsafe operations; and,
  4. Verify implementation of corrective actions.

Our signatures noted below will attest to the issues noted above. Please make a copy of this document for your files and return the original to my attention.

Sincerely,

  
\_\_\_\_\_  
Executive Management

  
\_\_\_\_\_  
Radiation Safety Officer

NRC FORM 313A (R80) (10-2015)	U.S. NUCLEAR REGULATORY COMMISSION <b>RADIATION SAFETY OFFICER TRAINING                  AND EXPERIENCE AND PRECEPTOR ATTESTATION</b> [10 CFR 35.50]	APPROVED BY OMB: NO. 3160-0120 (EXPIRES: 12/31/2016)
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Name of Proposed Radiation Safety Officer  
 Daniel Wale, D.O.

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 ( Yttrium-90 )

**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			

Total Hours of Training:

**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		
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides		
Securing and controlling byproduct material		
Using administrative controls to avoid mistakes in administration of byproduct material		
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures		
Using emergency procedures to control byproduct material		
Disposing of byproduct material		
Licensed Material Used (e.g., 35.100, 35.200, etc.)+ <div style="border: 1px solid black; height: 40px; width: 250px; margin-top: 5px;"></div>		

\* 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).

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**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"/> 35.300	<input type="checkbox"/> 35.400
<input type="checkbox"/> 35.500	<input type="checkbox"/> 35.600 (remote afterloader)
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input type="checkbox"/> 35.600 (teletherapy)
	<input type="checkbox"/> 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	John Brown, MD RSO Providence Hospital Southfield, MI 48175	4/1/2015-present
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	John Brown, MD RSO Providence Hospital Southfield, MI 48175	4/1/2015-present
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	John Brown, MD RSO Providence Hospital Southfield, MI 48175	4/1/2015-present
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):	BTQ International, Inc. at Providence St. John's Health	May 21, 2015

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U.S. NUCLEAR REGULATORY COMMISSION

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
John F. K. Brown, M.D.	21-02802-03

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 (Yttrium-90 )

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

NRC FORM 313A (RSO)  
(10-2016)

U.S. NUCLEAR REGULATORY COMMISSION

**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 Daniel Wale, D.O. is an  
Name of Proposed Radiation Safety Officer

- Authorized User  Authorized Nuclear Pharmacist
- Authorized Medical Physicist

identified on the Licensee's 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 Daniel Wale, D.O. 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
- 35.800 teletherapy units
- 35.800 gamma stereotactic radiosurgery units
- 35.1000 emerging technologies, including:

Yttrium-90

NRC FORM 313A (R80) (10-2015) U.S. NUCLEAR REGULATORY COMMISSION  
**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

AND

Third Section  
Complete for ALL

I attest that Daniel Wale, D.O. 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 Providence Hospital  
Name of Facility

License/Permit Number: 21-02802-03

Name of Preceptor <u>John F. K. Brown, M.D.</u>	Signature 	Telephone Number <u>248 569 4353</u>	Date <u>12/2/2015</u>
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**TELECOPY TRANSMITTAL**

DATE: 01/26/2016

TO: Materials Licensing Section

Fax Number: 1-630-515-1078

FROM: Michelle Kritzman, Consultant

RE: amendment for license 21-02802-03

COMMENTS: \_\_\_\_\_  
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This transmittal consists of 9 pages (including transmittal cover sheet). Please contact me if you have any questions or problems with this transmittal.

214 E. Huron Street Ann Arbor, MI 48104 (734) 662-9224 Fax (734) 662-3197	✱ 50 E. 91st Street, Suite 211 Indianapolis, IN 46240 (317) 581-1931 Fax (317) 581-1911	✱ 1731 E. Imperial Park Square Salt Lake City, UT 84106 (734) 662-9224 Fax (801) 272-2952	✱ N7375 Crystal Ridge Drive Beaver Dam, WI 53916 (920) 662-9224 Fax (920) 885-9870
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