

BARBARA ANN  
**KARMANOS**  
CANCER CENTER  
At the Detroit Medical Center

April 20, 2016

U.S. Nuclear Regulatory Commission, Region III  
Materials Licensing Branch  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

Re: Request for Authorized User Status for License #21-04127-06

Dear Reviewer,

This letter is a request for Authorized User status for Peter Paximadis, M.D. for 10 CFR 35.300, limited to parenteral administration of radium-223. The NRC Form 313A (AUT) is attached.

If you require further information please feel free to contact our RSO Joe Rakowski at (313)576-9616. Thank you.

Sincerely,



Mara Jelich  
Executive Director, Radiation Oncology and Imaging  
Karmanos Cancer Center  
4100 John R St., Mail Code GF00RO  
Detroit, MI 48201

Enclosure: NRC Form 313A (AUT)

4100 John R  
Detroit, Michigan 48201  
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info@karmanos.org | www.karmanos.org



RECEIVED APR 20 2016

NRC FORM 313A (AUT) (05-2012)	U.S. NUCLEAR REGULATORY COMMISSION  <b>AUTHORIZED USER TRAINING AND EXPERIENCE          AND PRECEPTOR ATTESTATION</b> (for uses defined under 35.300) <b>[10 CFR 35.390, 35.392, 35.394, and 35.396]</b>	APPROVED BY OMB: NO. 3150-0120 EXPIRES: (05/31/2016)
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Name of Proposed Authorized User Peter Paximadis, M.D.	State or Territory Where Licensed MI
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Requested Authorization(s) (check all that apply):

35.300 Use of unsealed byproduct material for which a written directive is required

**OR**

35.300 Oral administration of sodium iodide I-131 requiring a written directive in quantities less than or equal to 1.22 gigabecquerels (33 millicuries)

35.300 Oral administration of sodium iodide I-131 requiring a written directive in quantities greater than 1.22 gigabecquerels (33 millicuries)

35.300 Parenteral administration of any beta-emitter, or 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

**PART I -- TRAINING AND EXPERIENCE**  
(Select one of the three 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 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. For 35.390, provide documentation on supervised clinical case experience. The table in section 3.c. may be used to document this experience.

c. For 35.396, provide documentation on classroom and laboratory training, supervised work experience, and supervised clinical case experience. The tables in sections 3.a., 3.b., and 3.c. may be used to document this experience.

d. Skip to and complete Part II Preceptor Attestation.

2. **Current 35.300, 35.400, or 35.600 Authorized User Seeking Additional Authorization**

a. Authorized User on Materials License 21-04127-06 under the requirements below or equivalent Agreement State requirements (check all that apply):

35.390     35.392     35.394     35.490     35.690

b. If currently authorized for a subset of clinical uses under 35.300, provide documentation on additional required supervised case experience. The table in section 3.c. may be used to document this experience. Also provide completed Part II Preceptor Attestation.

c. If currently authorized under 35.490 or 35.690 and requesting authorization for 35.396, provide documentation on classroom and laboratory training, supervised work experience, and supervised clinical case experience. The tables in sections 3.a., 3.b., and 3.c. may be used to document this experience. Also provide completed Part II Preceptor Attestation.

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**AUTHORIZED USER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

**3. Training and Experience for Proposed Authorized User**

a. Classroom and Laboratory Training  35.390  35.392  35.394  35.396

Description of Training	Location of Training	Clock Hours	Dates of Training*
Radiation physics and instrumentation	Wayne State University/Karmanos Cancer Center <i>Residency</i>	40	7/1/2009 to 6/30/2013
Radiation protection	Wayne State University/Karmanos Cancer Center <i>Residency</i>	40	7/1/2009 to 6/30/2013
Mathematics pertaining to the use and measurement of radioactivity	Wayne State University/Karmanos Cancer Center <i>Residency</i>	40	7/1/2009 to 6/30/2013
Chemistry of byproduct material for medical use	Wayne State University/Karmanos Cancer Center <i>Residency</i>	40	7/1/2009 to 6/30/2013
Radiation biology	Wayne State University/Karmanos Cancer Center <i>Residency</i>	40	7/1/2009 to 6/30/2013
<b>Total Hours of Training:</b>		<input type="text" value="200"/>	

b. Supervised Work Experience  35.390  35.392  35.394  35.396

*If more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.*

Supervised Work Experience		Total Hours of Experience: 500	
Description of Experience Must Include:	Location of Experience/License or Permit Number of Facility	Confirm	Dates of Experience*
Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation surveys	Karmanos Cancer Center NRC#21-04127-06	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/1/2009 to 6/30/2013 <i>and</i> <i>2/1/16 - 4/1/16</i>
Performing quality control procedures on instruments used to determine the activity of dosages and performing checks for proper operation of survey meters	Karmanos Cancer Center NRC#21-04127-06	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/1/2009 to 6/30/2013 <i>and</i> <i>2/1/16 - 4/1/16</i>
Calculating, measuring, and safely preparing patient or human research subject dosages	Karmanos Cancer Center NRC#21-04127-06	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/1/2009 to 6/30/2013 <i>and</i> <i>2/1/16 - 4/1/16</i>
Using administrative controls to prevent a medical event involving the use of unsealed byproduct material	Karmanos Cancer Center NRC#21-04127-06	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/1/2009 to 6/30/2013 <i>and</i> <i>2/1/16 to 4/1/16</i>
Using procedures to contain spilled byproduct material safely and using proper decontamination procedures	Karmanos Cancer Center NRC#21-04127-06	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/1/2009 to 6/30/2013 <i>and</i> <i>2/1/16 to 4/1/16</i>

**AUTHORIZED USER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

**3. Training and Experience for Proposed Authorized User (continued)**

**b. Supervised Work Experience (continued)**

Supervising Individual: Nitin Vaishampayan, M.D.  
License/Permit Number listing supervising individual as an authorized user: 21-04127-06

Supervising individual meets the requirements below, or equivalent Agreement State requirements (*check all that apply*)\*\*:

- 35.390 With experience administering dosages of:
- 35.392  Oral NaI-131 requiring a written directive in quantities less than or equal to 1.22 gigabecquerels (33 millicuries)
- 35.394  Oral NaI-131 in quantities greater than 1.22 gigabecquerels (33 millicuries)
- 35.396  Parenteral administration of beta-emitter, or photon-emitting radionuclide with a photon energy less than 150 keV requiring a written directive is required
- Parenteral administration of any other radionuclide requiring a written directive

\*\* Supervising Authorized User must have experience in administering dosages in the same dosage category or categories as the individual requesting authorized user status.

**c. Supervised Clinical Case Experience**

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

Description of Experience	Number of Cases Involving Personal Participation	Location of Experience/License or Permit Number of Facility	Dates of Experience*
Oral administration of sodium iodide I-131 requiring a written directive in quantities less than or equal to 1.22 gigabecquerels (33 millicuries)			
Oral administration of sodium iodide I-131 requiring a written directive in quantities greater than 1.22 gigabecquerels (33 millicuries)			
Parenteral administration of any beta-emitter, or photon-emitting radionuclide with a photon energy less than 150 keV for which a written directive is required			
Parenteral administration of any other radionuclide for which a written directive is required  <div style="border: 1px solid black; padding: 2px; width: fit-content;">Ra-223</div> (List radionuclides)	3	Karmanos Cancer Center/21-04127-06	2/17/2016 - 4/15/2016

**AUTHORIZED USER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

**3. Training and Experience for Proposed Authorized User (continued)**

**c. Supervised Clinical Case Experience (continued)**

Supervising Individual	License/Permit Number listing supervising individual as an authorized user
Nitin Vaishampayan, M.D.	21-04127-06

Supervising individual meets the requirements below, or equivalent Agreement State requirements (*check all that apply*)\*\*:

- 35.390 With experience administering dosages of:
- 35.392 | | Oral NaI-131 requiring a written directive in quantities less than or equal to 1.22 gigabecquerels (33 millicuries)
- 35.394 | |  Oral NaI-131 in quantities greater than 1.22 gigabecquerels (33 millicuries)
- 35.396 | |  Parenteral administration of beta-emitter, or photon-emitting radionuclide with a photon energy less than 150 keV requiring a written directive is required
- 35.396 | |  Parenteral administration of any other radionuclide requiring a written directive

\*\* Supervising Authorized User must have experience in administering dosages in the same dosage category or categories as the individual requesting authorized user status.

**d. Provide completed 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.

By checking the boxes below, the preceptor is attesting that the individual has knowledge to fulfill the duties of the position sought and not attesting to the individual's "general clinical competency."

**First Section**

Check one of the following for each requested authorization:

**For 35.390:**

Board Certification

| | I attest that \_\_\_\_\_ has satisfactorily completed the training and experience requirements in 35.390(a)(1).  
Name of Proposed Authorized User

OR

Training and Experience

I attest that Peter Paximadis, M.D. \_\_\_\_\_ has satisfactorily completed the 700 hours of training and experience, including a minimum of 200 hours of classroom and laboratory training, as required by 10 CFR 35.390 (b)(1).  
Name of Proposed Authorized User

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## AUTHORIZED USER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

**Preceptor Attestation (continued)****First Section (continued)****For 35.392 (Identical Attestation Statement Regardless of Training and Experience Pathway):**

I attest that \_\_\_\_\_ has satisfactorily completed the 80 hours of classroom  
Name of Proposed Authorized User  
 and laboratory training, as required by 10 CFR 35.392(c)(1), and the supervised work and clinical case  
 experience required in 35.392(c)(2).

**For 35.394 (Identical Attestation Statement Regardless of Training and Experience Pathway):**

I attest that \_\_\_\_\_ has satisfactorily completed the 80 hours of classroom  
Name of Proposed Authorized User  
 and laboratory training, as required by 10 CFR 35.394 (c)(1), and the supervised work and clinical case  
 experience required in 35.394(c)(2).

**Second Section**

I attest that Peter Paximadis, M.D. \_\_\_\_\_ has satisfactorily completed the required clinical case  
Name of Proposed Authorized User

experience required in 35.390(b)(1)(ii)G listed below:

- Oral NaI-131 requiring a written directive in quantities less than or equal to 1.22  
 gigabecquerels (33 millicuries)
- Oral NaI-131 in quantities greater than 1.22 gigabecquerels (33 millicuries)
- Parenteral administration of beta-emitter, or photon-emitting radionuclide with a photon  
 energy less than 150 keV requiring a written directive is required
- Parenteral administration of any other radionuclide requiring a written directive

**Third Section**

I attest that Peter Paximadis, M.D. \_\_\_\_\_ has satisfactorily achieved a level of competency to  
Name of Proposed Authorized User

function independently as an authorized user for:

- Oral NaI-131 requiring a written directive in quantities less than or equal to 1.22  
 gigabecquerels (33 millicuries)
- Oral NaI-131 in quantities greater than 1.22 gigabecquerels (33 millicuries)
- Parenteral administration of beta-emitter, or photon-emitting radionuclide with a photon  
 energy less than 150 keV requiring a written directive is required
- Parenteral administration of any other radionuclide requiring a written directive

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(05-2012)

U.S. NUCLEAR REGULATORY COMMISSION

**AUTHORIZED USER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

**Fourth Section**

**For 35.396:**

**Current 35.490 or 35.690 authorized user:**

I attest that Peter Paximadis, M.D. is an authorized user under 10 CFR 35.490 or 35.690  
Name of Proposed Authorized User

or equivalent Agreement State requirements, has satisfactorily completed the 80 hours of classroom and laboratory training, as required by 10 CFR 35.396 (d)(1), and the supervised work and clinical case experience required by 35.396(d)(2), and has achieved a level of competency sufficient to function independently as an authorized user for:

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

**OR**

**Board Certification:**

I attest that \_\_\_\_\_ has satisfactorily completed the board certification  
Name of Proposed Authorized User

requirements of 35.396(c), has satisfactorily completed the 80 hours of classroom and laboratory training required by 10 CFR 35.396 (d)(1) and the supervised work and clinical case experience required by 35.396(d)(2), and has achieved a level of competency sufficient to function independently as an authorized user for:

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

**Fifth Section**

**Complete the following for preceptor attestation and signature:**

I meet the requirements below, or equivalent Agreement State requirements, as an authorized user for:

- 35.390       35.392       35.394       35.396

I have experience administering dosages in the following categories for which the proposed Authorized User is requesting authorization.

- Oral NaI-131 requiring a written directive in quantities less than or equal to 1.22 gigabecquerels (33 millicuries)
- Oral NaI-131 in quantities greater than 1.22 gigabecquerels (33 millicuries)
- Parenteral administration of beta-emitter, or photon-emitting radionuclide with a photon energy less than 150 keV requiring a written directive is required
- Parenteral administration of any other radionuclide requiring a written directive

Name of Preceptor Nitin Vaishampayan, M.D.	Signature 	Telephone Number (313) 503-2456	Date 4/20/16
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License/Permit Number/Facility Name  
Karmanos Cancer Center/21-04127-06

FAX

TO: NRC Region III  
FAX NUMBER: 630-515-1078  
FROM: Joe Rakowski  
FAX NUMBER:  
DATE: 4/20/2016  
REGARDING: Amendment  
TOTAL NUMBER OF PAGES INCLUDING COVER: 8  
PHONE NUMBER FOR FOLLOW-UP: 313-576-9616  
COMMENTS:

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4100 JOHN R  
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