



DEPARTMENT OF THE ARMY  
HEADQUARTERS, U.S. ARMY MEDICAL DEPARTMENT ACTIVITY  
289 IRELAND AVENUE  
FORT KNOX, KENTUCKY 40121-5111

MCXM-PMR

03001748

8 May 2017

MEMORANDUM FOR U.S. Nuclear Regulatory Commission (NRC), Region 1, 2100 Renaissance Boulevard, Suite 100 King of Prussia, PA 19406-2713

SUBJECT: Request to Change Radiation Safety Officer for NRC License Number: 16-03657-01, Docket No.: 030-01748

1. In accordance with 10 CFR 35.14, Ireland Army Health Clinic requests 1LT Monique M. Patron be listed as the Radiation Safety Officer on our license. 1LT Patron will begin RSO work duties on 27 June 2017.
2. 1LT Patron has completed the required training prescribed in 10 CFR 35.50 and will carry out her duties and responsibilities as authorized in our written radiation safety program per 10 CFR 35.24. 1LT Patron's NRC Form 313A (RSO) is enclosed.
3. The point of contact for this memorandum is CPT Jose H. Rodriguez, RSO, at (502) 624-0589.

Encl

  
ROBERT S. CORNES  
COL, MS  
Commanding

REC'D IN LAT 5-16-17

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NMSS/RGN1 MATERIALS-002

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

APPROVED BY OMB: NO. 3150-0120  
EXPIRES: 06/30/2019

Name of Proposed Radiation Safety Officer

1LT Monique M. Patron

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	AHP(ORAU), MXST(JBSA), MEIR(JBLM), HPRE(ORISE), MLSO(LIA), PHC NIRC(JBLM)	96, 19, 4, 3, 2.5, 1	9/14, 3/13, 7/14, 3/15, 2/15, 8/14
Radiation protection	AHP(ORAU), PHC NIRC(JBLM), HPRE(ORISE), MXST(JBSA), MEIR(JBLM), MLSO(LIA)	28, 27, 16, 11, 6, 6	9/14, 8/14, 3/15, 3/13, 7/14, 3/15
Mathematics pertaining to the use and measurement of radioactivity	AHP(ORAU), MARSSIM(JBLM), MXST(JBSA), HPRE(ORISE), PHC NIRC(JBLM)	46, 40, 25, 7, 3	9/14, 2/15, 3/13, 3/15, 8/14
Radiation biology	MEIR(JBLM), HPRE(ORISE), AHP(ORAU), MXST(JBSA), MLSO(LIA), PHC NIRC(JBLM)	14, 13, 10, 4, 3.5, 3	7/14, 3/15, 9/14, 3/13, 2/15, 8/14
Radiation dosimetry	AHP(ORAU), HPRE(ORISE)	20, 1	9/14, 2/15

**Total Hours of Training:**

**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	Madigan Army Medical Center, Ft. Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Apr 17 - Present
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides	Madigan Army Medical Center, Ft. Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Jul 14 - Present
Securing and controlling byproduct material	Madigan Army Medical Center, Ft. Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Jul 14 - Present
Using administrative controls to avoid mistakes in administration of byproduct material	Madigan Army Medical Center, Ft. Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Jul 14 - Present
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures	Madigan Army Medical Center, Ft Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Jul 14 - Present
Using emergency procedures to control byproduct material	Madigan Army Medical Center, Ft Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Jul 14 - Present
Disposing of byproduct material	Madigan Army Medical Center, Ft Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Jul 14 - Present
Licensed Material Used (e.g., 35.100, 35.200, etc.)+ <div style="border: 1px solid black; padding: 2px; width: fit-content;">35.100, 35.200, 35.300, 35.600</div>	Madigan Army Medical Center, Ft. Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Jul 14 - Present

+ 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
LTC David J. Phillips, PhD	NRC License No. 46-02645-03
This license authorizes the following medical uses:	
<input checked="" type="checkbox"/> 35.100	<input checked="" type="checkbox"/> 35.200
<input checked="" type="checkbox"/> 35.300	<input type="checkbox"/> 35.400
<input type="checkbox"/> 35.500	<input checked="" 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	Madigan Army Medical Center, Ft. Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Jul 14 - Present
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	Madigan Army Medical Center, Ft. Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Jul 14 - Present
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	Madigan Army Medical Center, Ft. Lewis, WA License No. 46-02645-03, RSO: LTC David Phillips	Jul 14 - 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	Madigan Army Medical Center, Ft. Lewis, WA Emergency Operations Training by Varian Rep	11 Feb 2015, 03 Feb 2016
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

LTC David J. Phillips, PhD NRC License No. 46-02645-03

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 (                      )

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 ILT Monique M. Patron 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 ILT Monique M. Patron 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 1LT Monique M. Patron 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 Madigan Army Medical Center, Joint Base Lewis-McChord, Tacoma, WA  
Name of Facility

License/Permit Number: NRC License No. 46-02645-03

Name of Preceptor	Signature	Telephone Number	Date
LTC David J. Phillips, PhD		(253) 968-4300	04/20/2017