

OAKLAND IMAGING DIAGNOSTIC CENTER

Oakland Medical Group Division
27483 Dequindre Suite 101
Madison Heights, Michigan 48071
(248) 544-9050



September 26, 2017

Daniel Strohmeyer, CHP
Health Physicist – Reviewer
Materials Licensing Branch
U.S. NRC, Region III

RADIATION SAFETY OFFICER AUTHORITY, DUTIES AND RESPONSIBILITIES

The Radiation Safety Officer (RSO) shall:

1. Have the authority to implement the Radiation Protection Program as referenced in 10 CFR 20.1101.
2. Have the authority, organizational freedom, time, resources, and management prerogative to:
 - a. Identify radiation safety problems;
 - b. Initiate, recommend or provide corrective actions,
 - c. Stop unsafe operations; and,
 - d. Verify implementation of corrective actions.
3. Investigate deviations from the radiation safety practices approved by facility management and/or the Radiation Safety Committee, if applicable.
4. Collect in a centralized location, executive management approved procedures that can include policy and technical issues which, would makeup the Radiation Protection Program as follows:
 - a. Authorization for the purchase of radioactive material.
 - b. Receipt and opening of packages containing radioactive material.
 - c. Storage of radioactive material.
 - d. Inventory control of radioactive material.
 - e. Safe use of radioactive material.
 - f. Emergency procedures in the event of loss, theft, etc.
 - g. Periodic radiation surveys and wipe tests
 - h. Checks of radiation survey and other radiation safety instruments.
 - i. Disposal of radioactive material.
 - j. Personnel training of those who work in or frequent areas of radioactive material use or storage.
5. Oversee a record system of the Radiation Protection Program per 10 CFR 20.2102 to include at least the following:

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The provisions of the Radiation Protection Program until the license is terminated by the NRC such as:

- a. All records, reports, written policies and procedures required by regulatory agencies concerning radioactive material.
- b. A copy of the regulations governing the possession, use and disposal of licensed material, such as Title 10 Code of Federal Regulations.

Audits and other reviews of the Radiation Protection Program content and implementation for a period of three (3) years after the record is made.

6. Periodically evaluate "action levels" for continued appropriateness to ensure compliance with 10 CFR 20.1501 and 1502 for the following:
 - a. Personnel exposure investigation levels
 - b. Area surveys dose rate and contamination levels
 - c. Bioassays, if necessary
 - d. Radioactive effluent concentrations, if necessary
7. Review the following Radiation Protection Program records, if applicable:
 - a. Sealed source inventories
 - b. Sealed source leak tests
 - c. Dose calibrator linearity tests
 - d. Dose calibrator accuracy tests
 - e. Dose calibrator geometrical variation tests
 - f. Occupational radiation exposure reports
 - g. Medical event documentation
 - h. Spill / incident reports for cause and corrective action
 - i. Dose rate and contamination survey results
 - j. Changes in the radiation safety program
8. Ensure the use of reasonable practices and controls to strive to maintain doses to workers and to the public are ALARA, in compliance with 10 CFR 20.1101(b).
9. Review with facility management at least annually of the content of the Radiation Protection Program and determine if the written program is being implemented in compliance with 10 CFR 20.1101(c).
10. Ensure as a part of the ALARA effort that individual members of the public shall not receive a Total Effective Dose Equivalent (TEDE) of more than 10 mrem (0.1 mSv) per year from airborne radioactive material releases as per 10 CFR 20.1101(d) as necessary.
11. Be a member of the Radiation Safety Committee (RSC), if applicable, that will oversee all uses of byproduct material permitted by the license as per 10 CFR 35.24(f).



Harold Margolis, D.O.
Executive Management
Oakland Imaging Diagnostic Center

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Oakland Medical Group Division
27483 Dequindre Suite 101
Madison Heights, Michigan 48071
(248) 544-9050



September 13, 2017

RE: RSO Availability and Ability to Perform Duties

Dear Dan:

Please find the information listed below concerning my availability and ability to perform RSO duties at this facility.

Item #1: My position at Medical Physics Consultants allows me adequate time and flexibility to address both my contractual and regulatory obligations to any facility that I am currently listed as the Radiation Safety Officer.

The position of Radiation Safety Officer is what we are contracted for by these facilities. All facilities have a signed contract by both them and Medical Physics Consultants. These contracts clearly outline both my responsibilities and the facilities. All facilities have also signed a RSO / Management Agreement form which has been forwarded to the NRC in all applications and / or amendments.

I have over 30 years of experience in Nuclear Medicine. This is my livelihood and my occupation.

Item #2: The amount of time for me to respond to an emergency involving radioactive material will vary depending upon my activities that day. Typically I would be able to respond immediately by phone. All facilities have both my cell phone and office phone numbers. The office staff at Medical Physics Consultants has a copy of my daily schedule at all times. The staff has phone numbers to any location that I might be working.

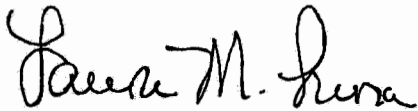
Medical Physics Consultants has an answering service that operates 24 hours a day, 7 days a week, 365 days a year. They have phone numbers for my home, cell and office. If for some reason they are not able to contact me, they have a list of other physicists that are employed by Medical Physics Consultants to contact. These individuals are board certified physicists with a great deal of expertise. This same mechanism has been in place for years whenever one of our facilities is in need of immediate expertise and advice. If we are contacted for a radiological emergency we direct the account to notify the appropriate management individual.

We audit the program quarterly, any unsafe practices or incidents are reported to management in writing. Items of significant concern are always reported to management verbally in addition to the written documentation.

Item #3: The amount of time that I will spend at this facility will vary. Time will depend upon the status of the Radiation Protection Program and other variables. As stated above quarterly reports are sent to management.

If you have any questions or if I may be of assistance, please contact me by phone at (734) 662-3197 or by e-mail at lluna@mpcphysics.com.

Respectfully Yours,

A handwritten signature in cursive script that reads "Laura M. Luna". The signature is written in black ink and is positioned above the typed name.

Laura Luna, BS
Medical Physics Consultants

Song, Taehoon

From: Strohmeyer, Daniel
Sent: Tuesday, September 26, 2017 7:24 AM
To: Sandrik, Lauren; Pavon, Sandy; Song, Taehoon
Subject: FW: Re: Control number 600388
Attachments: Explanation of Availability Letter.doc

Good Morning,

Please add to ADAMS for CN 600388.

Thank you,
Daniel

From: Pat Ciotti [mailto:pciotti@mhpdoctor.com]
Sent: Tuesday, September 26, 2017 6:55 AM
To: Strohmeyer, Daniel <Daniel.Strohmeyer@nrc.gov>
Subject: [External_Sender] Re: Control number 600388

Good Morning,

Attached is the letter of explanation of availability.

Have a great day.

Patricia Ciotti
Manager
Oakland Imaging Diagnostic Center
27483 Dequindre Road
Suite 101
Madison Heights, MI 48071

From: Strohmeyer, Daniel <Daniel.Strohmeyer@nrc.gov>
Sent: Tuesday, September 19, 2017 12:23:45 PM
To: Pat Ciotti
Subject: RE: Control number 600388

Good Morning,

In the attachment for the letter of understanding there is a reference to "see attached", but there is nothing attached. Please send the attachments if they are part of the MOU.

Thank you,

Daniel C. Strohmeyer, CHP
Health Physicist - Reviewer
Materials Licensing Branch

U.S. NRC, Region III
630.829.9689

From: Pat Ciotti [<mailto:pciotti@mhpdoctor.com>]
Sent: Friday, September 15, 2017 4:03 AM
To: Strohmeyer, Daniel <Daniel.Strohmeyer@nrc.gov>
Subject: [External_Sender] Control number 600388

Good morning Mr Strohmeyer,

Attached is the requested documentation for Control number 600388, License Number 21-25929-01, for Oakland Imaging Diagnostic Center.

Thank-you.

Patricia Ciotti
Office Manager
Oakland Imaging Diagnostic Center
27483 Dequindre Road Suite 101
Madison Heights, MI 48071