Wilfredo Rivera, M.D., P.C. Hameem Changezi, MD, FACC, FSCAI 2335 South Linden Road, Flint, MI 48532 Office Phone (810) 720-2400 Fax (810) 720-2401

October 12, 2017

MATERIALS LICENSING BRANCH UNITED STATES NUCLEAR REGULATORY COMMISSION, Region III 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352

RE: Control # 601062. Additional Information for RSO Change License # 21-32663-01

Dear Mr. Strohmeyer,

Here is the RSO Duties and Responsibilities paperwork you requested.

Thank you for your assistance with this matter.

Sincerely,

allabe done

Wilfredo Rivera, M.D., Executive Management Wilfredo Rivera, M.D, P.C.

Wilfredo Rivera, M.D., P.C.

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.
- Have the authority, organizational freedom, time, resources, and management prerogative to:
 - Identify radiation safety problems;
 - b. Initiate, recommend or provide corrective actions,
 - c. Stop unsafe operations; and,
 - d. Verify implementation of corrective actions.
- Investigate deviations from the radiation safety practices approved by facility management and/or the Radiation Safety Committee, if applicable.
- 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.
 - 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.
 - Emergency procedures in the event of loss, theft, etc.
 - 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.
- Oversee a record system of the Radiation Protection Program per 10 CFR 20.2102 to include at least the following:

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.
- 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.

08/21/17

RSO Authority, Duties & Responsibilities

- 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).
- 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).

10/12/2017

Song, Taehoon

From: Sent: To: Subject: Attachments: Strohmeyer, Daniel Thursday, October 12, 2017 9:32 AM Pavon, Sandy; Sandrik, Lauren; Song, Taehoon FW: Control# 601062 Scan0855.pdf

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Categories:

Material Licensing

Good Morning,

Please add the attached to ADAMS for CN 601062.

Thank you, Daniel

From: Jennifer Jones [mailto:jenjones38@yahoo.com] Sent: Thursday, October 12, 2017 9:30 AM To: Strohmeyer, Daniel <Daniel.Strohmeyer@nrc.gov> Subject: [External_Sender] Control# 601062

Please see attached letter Jennifer Jones Office Manager Wilfredo Rivera, M.D., P.C. phone 810-720-2400 fax 810-720-2401