

From: [Seeley, Shawn](#)
To: larry.damron@hma.com
Subject: Need additional information for MC602230
Date: Thursday, January 25, 2018 12:18:00 PM

Larry,

As we discussed, I need additional information in support of your request to change the RSO. Please have upper management respond to the following questions. Please fax the signed letter to my attention at 610-337-5269. Let me know if you have any questions.

You have requested that Travis Painter be named Radiation Safety Officer (RSO) on your license. It appears that this individual may be an outside consultant/contractor. If this is so, in support of this request, please address the following:

- a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.
- b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.
- c. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).
- d. Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.
- e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.

Thank you. We will continue our review upon receipt of the requested information.

Shawn

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