



2/14/18

Licensing Branch
Nuclear Materials Safety Section
Division of Safety & Safeguards
USNRC Region I DNMS
2100 Renaissance Boulevard
King of Prussia, PA 19406-27134

RE: Mail control number 602265, Response Letter
License No. 07-17792-01 **103013331**
Amendment Request

Ms. Farrah C. Gaskins,

- 1. The licensee wishes to name Lisa Marie Genovese as the RSO. Since Ms. Genovese is a consultant/contractor, in support of this request, please address the following:

Response: Ms. Genovese is a board certified medical physicist with Krueger-Gilbert Health Physics, ("KGHP"), which currently has a staff of fourteen medical physicists and has been providing medical/ health physics services in the Mid-Atlantic region for over 29 years. KGHP has provided medical physics consulting and RSO services to Beebe Medical Center ("Beebe") for 7 years.

- 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

Response: Under the terms of our contract with KGHP, Ms. Genovese has been granted a broad delegation of authority from the President of Beebe Medical Center, including but not limited to "the managing of radiation protection program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations." Ms. Genovese is granted "the authority necessary to meet those responsibilities, including prohibiting the use of radioactive material by employees who do not meet the necessary requirements and shutting down operations where justified by radiation safety." Given this broad mandate, Ms. Genovese has the appropriate authority to manage the radiation safety program and recommend actions to senior administrators at Beebe.

In addition, Ms. Genovese is in direct and frequent contact with Beebe administrators, including the Director of Imaging and regarding any matters, including expenditures, required to maintain compliance with our radiation safety program and related regulatory requirements. Her required participation at the quarterly radiation safety committee meeting provides another forum for any discussion of expenditures to maintain compliance. To date, we have identified no issues with respect to expenditure of funds as recommended by the RSO.

- 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).

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NRC/RCM MATERIALS-001

REC'D IN LAT 02/20/2018



Response: While Ms. Genovese services other KGHP clients as needed, she is contractually mandated to spend a minimum number of days on-site (currently one day per week on average) and devote additional time off-site (estimated to be 6-8 hours each month) to carry out her responsibilities as RSO for Beebe. Her responsibilities are clearly enumerated in the agreement with KGHP and there are processes in place for additional time to be approved as necessary to fulfill these responsibilities. Ms. Genovese's other commitments for KGHP have not caused any issue to date, nor do we anticipate that they will cause any issues going forward, with respect to the execution of her responsibilities under the agreement.

- 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.

Response: As RSO, Ms. Genovese works very closely with the Director of Imaging as well as the individual nuclear medicine technicians. The RSO's main point of contact is the Director of Imaging Services, Mr. Dan Mapes, who is an on-site, full-time employee. Mr. Mapes is briefed on a weekly basis and fully aware of program needs and status.

- 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 her presence.

Ms. Genovese is available to Beebe 24 hours per day, 7 days a week via mobile phone. Her contact information is made readily available to the technical staff should there be any questions or incidents regarding radiation. As noted above, KGHP employs fourteen medical physicists and a full time administrative staff to support the RSO and assist Beebe as necessary. KGHP provides a back-up RSO to cover radiation related issues should the RSO be unavailable by phone or e-mail (e.g. vacation, medical leave, etc) and the relevant contact information is made available to the staff. It should also be noted that in addition to Ms. Genovese, Mr. Daneshvar, our current RSO is on staff at KGHP. He and the KGHP team are available as necessary to provide support, and in the event of an emergency, the RSO (or her designee) can be onsite within 2-3 hours.

If additional information is needed or there are any questions regarding our request, please contact either, Ms. Genovese directly at (410) 339-5447 or our Executive Director, Mr. Dan Mapes at (302) 645-3709.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey M. Fried', is written over a light blue horizontal line.

Jeffrey M. Fried, FACHE
President and CEO