



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

APR 26 2018

David H. Roehrs, M.D.
Radiation Safety Officer
Bothwell Regional Health Center
601 E. 14th Street
Sedalia, MO 65302-1706

Dear Dr. Roehrs:

Enclosed is Amendment No. 27 to your NRC Material License No. 24-16275-01 in accordance with your request.

Please note that, at this time we are not able to authorize the use of a high dose rate remote afterloader in accordance with 10 CFR 35.600 because your response to the request for additional information was incomplete. If you wish to continue to pursue with the amendment request, you will need to provide completed responses to the following:

- In your description of the safety procedures required by 10 CFR 35.610, you did not include a commitment to retain a copy of the procedures required by §§ 35.610(a)(4) and (d)(2) in accordance with § 35.2610.
- In your request, you provided a description of the safety precautions as required by 10 CFR 35.615, however, your response did not include a commitment to ensure sources can be expeditiously removed from a patient.
- In your request, you provided procedures on how spot checks will be completed in accordance with 10 CFR 35.643, however, your procedure did not include verification of the radiation monitors used to indicate source position.

In a separate request, you asked to add Dr. Jabi to your license for uses under 10 CFR 35.300, limited to oral administration of sodium iodine-131. However the board certificate provided is not acceptable for uses under 10 CFR 35.300 and your response did not provide either a different board certificate or revised NRC 313A(AUT) form. At this time, we will not be able to add Dr. Jabi for 10 CFR 35.300 uses. If you wish to continue with this request, you will need to either provide an acceptable board certificate or provide a revised NRC Form 313A(AUT) completed using the training and experience pathway.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy

and Procedure for NRC Enforcement Actions. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

In accordance with 10 Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,



Jennifer L. Bishop
Health Physicist
Materials Licensing Branch

License No. 24-16275-01
Docket No. 030-10715

Enclosure: Amendment No. 27