



*Caring. Commitment. Community.*

August 6, 2018

**United States Nuclear Regulatory Commission**

Region III, Materials Licensing  
2443 Warrenville Road, Ste 210  
Lisle, IL 60532-43521

Re: Amendment to NRC License # 21-24813-01  
Hillsdale Community Health Center

Dear Sir/Madam:

The purpose of this letter is to amend our current NRC license to reflect the following:

The purpose of this letter is to amend our current NRC license. Please list the following individual as the RSO to our NRC License..

- James M. Botti, MS

Mr. Botti is currently listed as a RSO on NRC license 21-08966-01 (McLaren Central Michigan)

We have enclosed the following for your review and approval.

- RSO / Management Agreement Letter
- RSO Availability to Perform Duties

We appreciate your assistance with this amendment. If you have any questions or require additional information, please contact our RSO, James Botti via e-mail [jbotti@mpcphysics.com](mailto:jbotti@mpcphysics.com) or by phone at 734-662-3197.

Respectfully Yours,

Duke Anderson  
President/CEO





August 6, 2018

**United States Nuclear Regulatory Commission**

Region III, Office of Materials Licensing  
2443 Warrenville Road  
Suite 210  
Lisle, IL 60532-4352

**RE: RSO Availability and Ability to Perform Duties**

To Whom It May Concern:

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 am a board certified by the American Board of Radiology in Medical Nuclear Physics, Diagnostic Radiological Physics. Additionally I am certified by the American Board of Medical Physics in Medical Health Physics. I have over 25 years of experience in Nuclear Medicine. This is my livelihood and my occupation.

All facilities are audited on a quarterly basis which is standard of practice. These audits are forwarded to both management and the supervising technologist. These audits are reviewed and signed by both of these individuals. Any items that require attention are documented by the supervising technologist.

Please review the previous inspection history of any facility that I have been listed as the Radiation Safety Officer and you will find that I have an excellent track record with respect to compliance to NRC regulations.

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(734) 662-3197



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N7375 Crystal Ridge Drive  
Beaver Dam, WI 53916  
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**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 also 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.


As stated earlier 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.

**Item #4:** All individuals who handle or have access to radioactive material are overseen by a supervisor. These supervisors reports directly to management and the Radiation Safety Officer. All individuals are in-serviced yearly. Management in their license application have committed to supplying the necessary resources for these individuals to achieve regulatory compliance. Additionally, they have committed to this in the RSO / Management Agreement letter.

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 [jbotti@mpcphysics.com](mailto:jbotti@mpcphysics.com).

Respectfully Yours,



James M. Botti, MS  
Radiological Physicist  
Board Certified, ABR, ABMP



*Caring. Commitment. Community.*

**RSO / EXECUTIVE MANAGEMENT  
LETTER OF UNDERSTANDING**

August 6, 2018

James M. Botti, MS  
Radiation Safety Officer  
Medical Physics Consultants, Inc.  
214 East Huron Street.  
Ann Arbor, MI 48104

Re: Radiation Safety Officer / Executive Management  
Letter of Understanding

Dear Mr. Botti:

You have been appointed the Radiation Safety Officer (RSO) of this facility. This "Letter of Understanding" has been prepared to demonstrate that you willingly have accepted the duties and responsibilities of this position. I understand that my duties in this position include the following:

- Assume responsibility for implementing the Radiation Protection Program
- Ensure that radiation safety activities are being performed in accordance with our own approved procedures and all regulatory requirements.

The executive management of this facility agrees to provide you as RSO:

- Specific written notation of your authority, duties and responsibilities.
- Sufficient authority, organizational freedom, time, resources and management prerogative to:
  1. Identify radiation safety problems;
  2. Initiate, recommend, or provide corrective actions;
  3. Stop unsafe operations; and,
  4. Verify implementation of corrective actions.

Sincerely,

\_\_\_\_\_  
President/CEO  
Duke Anderson

\_\_\_\_\_  
Radiation Safety Officer  
James M. Botti, MS



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## **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:

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.
- c. 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).

FROM: (517) 437-5200  
Scott Sessions  
Hillsdale Hospital  
168 South Howell Street  
Hillsdale MI 49242  
US

SHIP DATE: 09AUG18  
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