



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

OCT 25 2019

Laura Stollard, MSN, RN
Director Patient Safety, Clinical
Excellence, Risk Management
Barnes-Jewish West County Hospital
12634 Olive Blvd.
St. Louis, MO 63141

Dear Ms. Stollard:

This refers to the letter ("the May letter") dated May 24, 2019, received in our offices on August 21, 2019, signed by Trisha Lollo, President of Barnes-Jewish West County Hospital and the letter ("the October letter") dated October 23, 2019, received in our offices on October 23, 2019, signed by you.

The May letter requests a change in your Radiation Safety Officer (RSO) and a change in the physical location of your hospital to a newly constructed building near the present building that also will bear the same address that is currently on the license. Specifically, the new nuclear medicine department in the new building is requested to be added to the license.

This also refers to telephone discussion between your proposed RSO, Johnne Dawson, M.S. and me on September 30, 2019, in which Ms. Dawson called me; the subsequent emails exchanged between your incumbent RSO, Emily Chasteen, on September 30, 2019 (Ms. Chasteen initially emailed me); and the telephone discussion between you and me on October 22, 2019, in which you called me.

I responded to Ms. Chasteen and to you with emails dated September 30, 2019, and October 22, 2019. Ms. Chasteen disputed whether an amendment to the license was required for the addition of the new hospital building and its nuclear medicine department, pursuant to 10 CFR 35.13 and 35.14 but I responded that the amendment is, in fact, required because two different buildings are involved that just happen to have the same postal address. The nuclear medicine department in the old hospital is different than the nuclear medicine department in the new hospital. In addition, note that 10 CFR 30.33(a)(2) requires, in part, that you request and receive an amendment to your license before making changes to your facilities where radioactive materials are used.

The substance of our communications appears to be that your organization submitted the May letter to us but we did not receive it. After several months, someone in your organization realized the amendment had not been received by your staff and the May letter was sent to us on August 21, 2019, when we did receive it.

It was initially assigned to another reviewer who then assumed a different position which resulted in this request being assigned to me on September 24, 2019. The May letter does not state when the new hospital is expected to open.

Ms. Dawson told me it was scheduled to open soon. I expressed my initial concerns with her that her qualifications as RSO appeared to not meet 10 CFR 35.50 and the proposed new

nuclear medicine department also did not align with the guidance in NUREG 1556 Vol. 9, Rev. 3, which had just been published, or with its previous version, Revision 2.

I verbally and in emails recommended that both the RSO change and the nuclear medicine department change be vetted by your staff against our regulations and guidance, as described above.

As of the date of your call, October 22, 2019, we had not received any additional information. In your call to me on October 22, 2019, you said that the new hospital was scheduled to open November 5, 2019, and you asked about the status of the amendment. I recounted the above historical background and context to you.

You said you would prepare a written response and transmit it to us, which you did on October 23, 2019.

In the October letter you stated that "At this time, we will not be requesting to change our radiation safety officer (RSO). Emily Chasteen, M.S. will remain our RSO. We will send a separate license amendment request if we decide to make this change in the future."

We consider your statements in the October letter to constitute the withdrawal of the request to change RSOs. No further action on your part is required to resolve this matter at this time.

Concerning your request to add the new hospital to the license, we noted that, except for adding the direction of north and redacting most of the facilities diagram as was shown in the May letter, save for the actual nuclear medicine rooms, the diagram and information provided were the same. Apparently, the vetting I recommended with the NUREG 1556 Vol. 9, Rev. 3 guidance was not completed.

Please see NUREG 1556 Vol. 9, Rev. 3 at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v9/r3/>. Section 8.9.1, as listed in the Table of Contents, addresses facilities and equipment and diagrams. Please provide the following information in response, including a diagram, as appropriate.

Your diagram of the new hospital's nuclear medicine department does not identify the room numbers; location of the hot lab sink; location of a fume hood (if any); location of waste and receiving areas in the hot lab; types and locations of shielding materials in the hot lab; and the specification as to which doors are access controlled in the new department, (i.e., locked).

Please also describe which floor or elevation the new department is to be located on.

Please note that simple, hand drawn diagrams are best. Please do not submit blueprints, copies of blueprints or architectural renderings as these typically contain extraneous details and lack information that we need.

Within 5 days of the date of this letter (by October 30, 2019), please prepare a written response as an amendment request, marked to my attention at the above address as "additional information to control number 613948."

This will help ensure that your response is processed correctly in our offices. Your letter must completely identify your license and be currently dated and legibly signed by a senior management official.

If an alternative timeframe for response is needed please contact me directly. Or, if you have any specific questions concerning this letter or the information we are requesting, please contact me at either (630) 829-9841 or (800) 522-3025, ext. 9841. My fax number is (630) 515-1078. My email address is colleen.casey@nrc.gov.

The fastest and most reliable method of responding is to send a fax to me at (630) 515-1078. Please do not email your response to me, either instead of or in addition to, a faxed response.

Under no circumstances should you submit more than one copy of your written response to us or submit the same response by more than one means of transmission. Doing so will add delay and confusion to processing your response.

Please also be reminded of the provisions in 10 CFR 30.9(a), "Completeness and accuracy of information, ..." (a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

What this means, in part, is that the first vetting of any licensing request is expected to be made by the requesting licensee, against the regulations, license requirements and guidance involved.

Only after the request has been thoroughly vetted and corrected by the licensee should the licensing correspondence be transmitted to NRC.

Please always include the direct telephone number and fax number of at least one person who serves as a point of contact for your licensing request. It is also helpful to provide us with the email address of at least one contact person. It does not appear that we have complete and current information for you at this time. Please provide it with your written response.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter 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,



Colleen Carol Casey
Materials Licensing Branch

Docket No.: 030-31901
License No.: 24-26243-01
Control No.: 613948