

# FREEMAN HEALTH SYSTEM

1102 WEST 32ND STREET • JOPLIN, MO 64804-3599 • 417.FHS.1111  
freemanhealth.com



March 2, 2020

U.S. Nuclear Regulatory Commission-Region III  
2443 Warrensville Road-Suite #210  
Lisle, Illinois 60532-4352

To whom it may concern:

We are requesting the following changes be made to our Freeman Neosho Hospital license (24-26789-01).

We would like to modify the RSO from Paul S. Jones, MD to Joshua M. Ball, MD.

Attached are forms 313A (RSO), copy of Joshua M. Ball's license and a copy of our current NRC license.

If you have any questions, or need any further assistance or information, please contact us at (417) 347-4934 or through email at [ldeardorff@freemanhealth.com](mailto:ldeardorff@freemanhealth.com).

Thank you,

Paul S. Jones, MD  
Radiation Safety Officer  
Freeman Neosho Hospital

REGISTERED AND ACCREDITED FOR QUALITY



RECEIVED MAR 08 2020

Freeman Health System is an equal opportunity/affirmative action employer, and services and benefits are provided on a non-discriminatory basis.

# FREEMAN HEALTH SYSTEM

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## DELEGATION OF AUTHORITY LETTER

To: Joshua Ball, MD, Freeman Health System Radiologist and active NRC Authorized User

From: Lesa Deardorff, Director of Radiology Services, Freeman Health System

Subject: Delegation of Authority

Thank you for agreeing to serve as Radiation Safety Officer for Freeman Neosho Hospital as Dr. Paul S. Jones plans for retirement. As RSO, you will be responsible for ensuring the safe use of radiation and radioactive materials. You will be responsible for managing the Radiation Protective Program, identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementations of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct materials by employees who do not meet the necessary requirements and shutting down operations were justified to maintain radiation safety. You are required to notify management if staff do not cooperate and do not address radiation safety issues. In addition, you are hereby free to raise issues with NRC directly at any time. This agreement goes into effect pending NRC approval of your RSO application.

Lesa Deardorff, Director of Radiology Services, FHS

3/2/2020

Dated

I accept the above responsibilities.

Joshua Ball, MD, Freeman Health System Radiology

3/2/2020

Dated

REGISTERED AND ACCREDITED FOR QUALITY





**RADIATION SAFETY OFFICER OR  
ASSOCIATE RADIATION SAFETY OFFICER  
TRAINING, EXPERIENCE AND PRECEPTOR ATTESTATION  
[10 CFR 35.57, 35.50]**

Name of Individual

RSO

ARSO

Joshua Ball MD

Requested Authorization(s) *The license authorizes the following medical uses (check all that apply):*

- 35.100     35.200     35.300     35.400     35.500     35.600 (remote afterloader)
- 35.600 (teletherapy)     35.600 (gamma stereotactic radiosurgery)     35.1000 (\_\_\_\_\_)

**PART I -- TRAINING AND EXPERIENCE**

**(Select one of the five methods below)**

\*Training and Experience, including board certification, must have been obtained within the 7 years preceding the date of application or the individual must have obtained related continuing education and experience since the required training and experience was completed. Provide dates, duration, and description of continuing education and experience related to the uses checked above.

**1. Board Certification**

- a. Provide a copy of the board certification.
- b. If the board certification process has been recognized by the Commission or an Agreement State under 10 CFR 35.50;
  - (i) Go to the table in 5c and describe training provider and dates of training for each type of use for which authorization is sought.
  - (ii) Stop here
- c. If the board certification was issued on or before October 24, 2005 and is listed in 10 CFR 35.57 (a)(2);
  - (i) Provide documentation demonstrating that the individual was using the requested materials and uses on or before October 24, 2005;
  - (ii) Stop here

OR

**2. Current Radiation Safety Officer (RSO) or Associate Radiation Safety Officer (ARSO) Seeking Authorization to Be Recognized as a RSO or ARSO for the Additional Medical Uses Checked Above**

- a. Use the table in section 5.c. to describe training in radiation safety, regulatory issues, and emergency procedures for the additional types of medical use for which recognition as RSO or ARSO is sought.
- b. If board certified, provide a copy of the certificate and stop here. If not board certified, skip to and complete Part II Preceptor Attestation.

OR

**3. Authorized User (AU), Authorized Medical Physicist (AMP), or Authorized Nuclear Pharmacist (ANP) identified on a license or permit in accordance with 10 CFR 35.50 (c)(2)**

- a. Provide license number.
- b. Use the table in section 5.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.
- c. If board certified, provide a copy of the certificate and stop here. If not board certified, skip to and complete Part II Preceptor Attestation.

OR

**RADIATION SAFETY OFFICER OR  
ASSOCIATE RADIATION SAFETY OFFICER  
TRAINING, EXPERIENCE AND PRECEPTOR ATTESTATION [10 CFR 35.57, 35.50] (continued)**

**4. Individuals applying simultaneously to be the RSO and AU on a new license**

- a. Documentation of training and experience to be a new AU is attached
- b. The new license application is attached.
- c. Stop here.

**OR**

**5. Structured Educational Program for Proposed RSO or ARSO**

a. Classroom and Laboratory Training

Description of Training	Location of Training	Clock Hours	Dates of Training*
Radiation physics and instrumentation			
Radiation protection			
Mathematics pertaining to the use and measurement of radioactivity			
Radiation biology			
Radiation dosimetry			
<b>Total Hours of Training:</b> <input style="width: 50px; height: 20px;" type="text"/>			

**RADIATION SAFETY OFFICER OR  
ASSOCIATE RADIATION SAFETY OFFICER  
TRAINING, EXPERIENCE AND PRECEPTOR ATTESTATION [10 CFR 35.57, 35.50] (continued)**

**5. Structured Educational Program for Proposed RSO or ARSO (continued)**

**b. Supervised Radiation Safety Experience**

*(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)*

Description of Experience	Location of Training/ License or Permit Number of Facility	Dates of Training*
Shipping, receiving, and performing related radiation surveys		
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides		
Securing and controlling byproduct material		
Using administrative controls to avoid mistakes in administration of byproduct material		
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures		
Using emergency procedures to control byproduct material		
Disposing of byproduct material		
Licensed Material Used (e.g., 35.100, 35.200, etc.)+ <div style="border: 1px solid black; height: 40px; width: 100%; margin-top: 5px;"></div>		

+ Choose all applicable sections of 10 CFR Part 35 to describe radioisotopes and quantities used: 35.100, 35.200, 35.300, 35.400, 35.500, 35.600 remote afterloader units, 35.600 teletherapy units, 35.600 gamma stereotactic radiosurgery units, emerging technologies (provide list of devices).

**RADIATION SAFETY OFFICER OR  
ASSOCIATE RADIATION SAFETY OFFICER  
TRAINING, EXPERIENCE AND PRECEPTOR ATTESTATION [10 CFR 35.57, 35.50] (continued)**

**5. Structured Educational Program for Proposed RSO or ARSO (continued)**

**b. Supervised Radiation Safety Experience (continued)**

(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)

Supervising Individual  <i>Dr. Paul Jones M.D.</i>	License/Permit Number listing supervising individual as a Radiation Safety Officer or Associate Radiation Safety Officer  <i>24-26789-01</i>
The supervising individual is authorized as the for the following medical uses:	
<input checked="" type="checkbox"/> 35.100	<input checked="" type="checkbox"/> 35.200
<input type="checkbox"/> 35.500	<input type="checkbox"/> 35.600 (remote afterloader)
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input type="checkbox"/> 35.1000 ( _____ )
<input type="checkbox"/> 35.300	<input type="checkbox"/> Radiation Safety Officer or the
<input type="checkbox"/> 35.400	<input type="checkbox"/> Associate Radiation Safety Officer
<input type="checkbox"/> 35.600 (teletherapy)	

**c. Describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license for the RSO or types of use for which the ARSO will be listed on the license.**

Description of Training	Training Provided By	Dates of Training*
Radiation safety, regulatory issues, and emergency procedures for 35.100, 35.200, and 35.500 uses	<i>Dr. Paul S. Jones M.D</i>	<i>1/1/18 to Present</i>
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	<i>NA</i>	
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	<i>NA</i>	
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses	<i>NA</i>	
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses	<i>NA</i>	
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses	<i>NA</i>	
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):	<i>NA</i>	

RADIATION SAFETY OFFICER OR ASSOCIATE RADIATION SAFETY OFFICER TRAINING, EXPERIENCE AND PRECEPTOR ATTESTATION [10 CFR 35.57, 35.50] (continued)

5. Structured Educational Program for Proposed RSO or ARSO (continued)

c. Training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license (continued)

Supervising Individual If training was provided by supervising RSO, ARSO, AU, AMP, or ANP. License/Permit Number listing supervising individual Paul S. Jones, MD 24-26789-01

License/Permit lists supervising individual as:

- Radiation Safety Officer, Associate Radiation Safety Officer, Authorized User, Authorized Nuclear Pharmacist, Authorized Medical Physicist

Authorized as RSO, ARSO, AU, ANP, or AMP for the following medical uses:

- 35.100, 35.200, 35.300, 35.400, 35.500, 35.600 (remote afterloader), 35.600 (teletherapy), 35.600 (gamma stereotactic radiosurgery), 35.1000

d. Skip to and complete Part II Preceptor Attestation.

PART II - PRECEPTOR ATTESTATION

Note: This part must be completed by the individual's preceptor. The preceptor does not have to be the supervising individual as long as the preceptor provides, directs, or verifies training and experience required.

First Section

Structured Educational Program for Proposed RSO or ARSO

I attest that [Name] has satisfactorily completed a structural educational program consisting of both 200 hours of classroom and laboratory training and one year of full-time radiation safety experience as required by 10 CFR 35.50(b)(1).

AND

Second Section

I attest that Joshua Ball, MD has training in radiation safety, regulatory issues, and emergency procedures for the following types of use:

Check all that apply:

- 35.100, 35.200, 35.300 oral administration of less than or equal to 33 millicuries of sodium iodide I-131, for which a written directive is required, 35.300 oral administration of greater than 33 millicuries of sodium iodide I-131, 35.300 Parenteral administration of any radioactive drug that contains a radionuclide that is primarily used for its electron emission, beta radiation characteristics, alpha radiation characteristics, or photon energy of less than 150 keV, for which a written directive is required

**RADIATION SAFETY OFFICER OR  
ASSOCIATE RADIATION SAFETY OFFICER  
TRAINING, EXPERIENCE AND PRECEPTOR ATTESTATION [10 CFR 35.57, 35.50] (continued)**

**PART II – PRECEPTOR ATTESTATION (continued)**

Check all that apply:

- 35.400
- 35.500
- 35.600 remote afterloader units
- 35.600 teletherapy units
- 35.600 gamma stereotactic radiosurgery units
- 35.1000 emerging technologies, including:

**Third Section**

**AND**

I attest that Joshua Ball, MD  
Name of Proposed Radiation Safety Officer or Associate Radiation Safety Officer

is able to independently fulfill the radiation safety-related duties as:

A Radiation Safety Officer for a medical use licensee.

**OR**

An Associate Radiation Safety Officer for a medical use licensee.

**Fourth Section**

**Complete the following for Preceptor Attestation and signature**

I am the Radiation Safety Officer for       I am the Associate Radiation Safety Officer for

Name of Facility: Freeman Neasbo Hospital

License/Permit Number: 24-26789-01

Name of Preceptor (Typed or printed)

Paul S Jones MD

Telephone Number

417-347-4934

Date

3-2-2020

Signature

Paul S. Jones MD



# The American Board of Radiology

Organized through the cooperation of the  
American College of Radiology, the American Roentgen Ray Society,  
the American Radium Society, the Radiological Society of North America,  
the Section on Radiology of the American Medical Association,  
the American Society for Radiation Oncology, the Association of  
University Radiologists, and the American Association of Physicists in Medicine.

Hereby certifies that

*copy*  
**Joshua Michael Ball, MD**

*Ball MD  
6/4/11*

Has pursued an accepted course of graduate study and clinical work; has met certain standards and qualifications, including passing the examinations conducted under the authority of The American Board of Radiology, demonstrating to the satisfaction of the Board qualification to practice; and is therefore awarded the Board's certification in the specialty of

**Diagnostic Radiology**

AB Eligible

July 01, 2011

This diplomate of the American Board of Radiology  
is now permitted to use the **ABR** mark to signify this certification.



*Gene J. Harris*  
President

*Richard T. Moran*  
Secretary-Treasurer

*Henry S. ...*  
Executive Director

**ABR**



Valid through 2021



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

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

JAN 27 2020

Paul S. Jones, M.D.  
Radiation Safety Officer  
Freeman Neosho Hospital  
113 W Hickory St.  
Neosho, MO 64850

Dear Dr. Jones:

Enclosed is Amendment No. 7 to your U.S. Nuclear Regulatory Commission (NRC) Material License No. 24-26789-01 for Freeman Neosho Hospital in accordance with the licensee's requests dated December 17, 2019, and January 16, 2020. Please note that Joshua M. Ball, M.D. was not authorized for use of Title 10 of the *Code of Federal Regulations* (CFR) 35.300 material because License No. 24-26789-01 does not authorize the use of the material.

Amendment No. 7 to your NRC License No. 24-26789-01 was generated using a new Web Based Licensing System. Additionally, we have deleted Condition No. 13 because financial assurance requirements are addressed in 10 CFR 30.35. Further, we have deleted Condition No. 14 in accordance with current NRC policy to include the reference to 10 CFR, Part 71, "Packaging and Transportation of Radioactive Material," in the preamble, on page 1 of the license.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the NRC Region III office at (630) 829-9887 so that we may 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. The NRC may issue a notice of violation, 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.

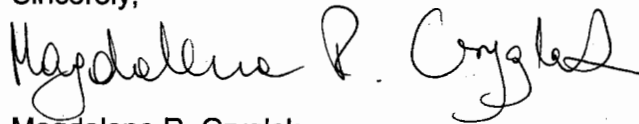
The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material 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.

P. Jones

- 2 -

In accordance with 10 CFR 2.390, a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

A handwritten signature in black ink that reads "Magdalena R. Gryglak". The signature is written in a cursive style with a large initial 'M' and a long, sweeping tail on the 'k'.

Magdalena R. Gryglak  
Health Physicist  
Materials Licensing Branch

License No. 24-26789-01

Docket No. 030-34412

Enclosure: Amendment No. 7

**MATERIALS LICENSE**

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 70 and 71, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee 1. Freeman Neosho Hospital  2. 113 W Hickory St. Neosho, MO 64850		In accordance with letter dated December 17, 2019.	4. Expiration Date: February 28, 2023
		3. License number: 24-26789-01 is amended in its entirety to read as follows:	5. Docket No.: 030-34412 Reference No.:
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license	9. Authorized use
A. Any byproduct material permitted by 10 CFR 35.100	A. Any	A. As Needed	A. For use in uptake, dilution and excretion studies permitted by 10 CFR 35.100.
B. Any byproduct material permitted by 10 CFR 35.200	B. Any	B. As Needed	B. For use in imaging and localization studies permitted by 10 CFR 35.200.
C. Any byproduct material permitted by 10 CFR 31.11	C. Prepackaged Kits	C. 5 millicuries	C. For use in in-vitro studies.
<b>CONDITIONS</b>			
10. Licensed material may be used or stored at the licensee's facilities located at 113 W Hickory St., Neosho, Missouri, 64850.			
11. The Radiation Safety Officer (RSO) for this license is Paul S. Jones, M.D.			

**MATERIALS LICENSE  
SUPPLEMENTARY SHEET**License Number  
24-26789-01Docket or Reference Number  
030-34412

Amendment No. 7

12. Licensed material shall only be used by, or under the supervision of:

A. Individuals permitted to work as authorized users in accordance with 10 CFR 35.13 and 10 CFR 35.14.

B. The following individuals are authorized users for the material and medical uses as indicated:

Authorized User(M.D.,D.O.,etc.)Material and Use

Joshua M. Ball, M.D.

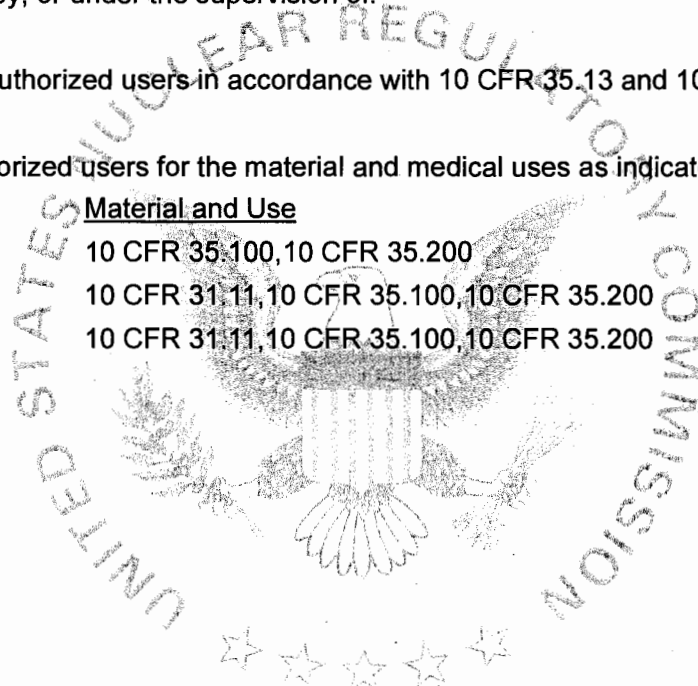
10 CFR 35.100,10 CFR 35.200

Paul S. Jones, M.D.

10 CFR 31.11,10 CFR 35.100,10 CFR 35.200

John K. Williams, M.D.

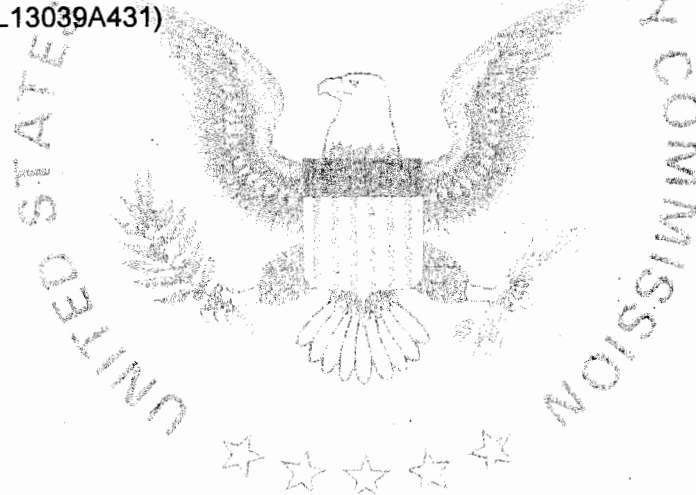
10 CFR 31.11,10 CFR 35.100,10 CFR 35.200



**MATERIALS LICENSE  
SUPPLEMENTARY SHEET**License Number  
24-26789-01Docket or Reference Number  
030-34412

Amendment No. 7

13. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. This license condition applies only to those procedures that are required to be submitted in accordance with the regulations. Additionally, this license condition does not limit the licensee's ability to make changes to the radiation protection program as provided for in 10 CFR 35.26. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated August 24, 2012 (ML12244A581)
  - B. Letter dated February 8, 2013 (ML13039A431)



FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date: JAN 27 2020By: Magdalena R. Gryglak  
Magdalena R. Gryglak  
Region 3

1102 West 32<sup>nd</sup>  
Juplin, mo  
64804  
Radiology Dept

605 605 605325 R1-71

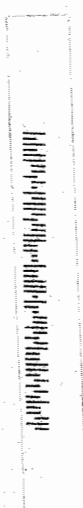
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Springfield, MO  
PERMIT # 881



4099200305-173136718

ADDRESS SERVICE REQUESTED

30522



U.S. Nuclear Regulatory Commission - Region 111  
2443 Warrensville Road - Suite # 210  
Lisle, Illinois 60532-4352

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