

Pavon, Sandy

From: Tomczak, Tammy
Sent: Tuesday, May 05, 2020 6:17 AM
To: Song, Taehoon; Pavon, Sandy
Subject: FW: Temporary Exemptions

Hi Sandy and Tae,

Can you please add this email to ADAMS?

Thanks,
Tammy

From: Orlikowski, Robert <Robert.Orlikowski@nrc.gov>
Sent: Monday, May 04, 2020 6:22 PM
To: Tomczak, Tammy <Tammy.Tomczak@nrc.gov>
Cc: Kennedy, Erin <Erin.Kennedy@nrc.gov>
Subject: FW: Temporary Exemptions

Hi Tammy,

We received another exemption request related to COVID-19 pandemic hardships. This one came to RIII via email sent to Dave Pelton.

Can you please process in and assign to Erin Kennedy?

Thanks,

Bob

From: Pelton, David <David.Pelton@nrc.gov>
Sent: Monday, May 04, 2020 12:50 PM
To: Orlikowski, Robert <Robert.Orlikowski@nrc.gov>
Cc: Lipa, Christine <Christine.Lipa@nrc.gov>
Subject: FW: Temporary Exemptions

Bob,

Here's a new incoming exemption request...Beaumont Health.

dave p.

From: Shaffer, Sheila <Sheila.Shaffer@beaumont.org>
Sent: Monday, May 04, 2020 12:10 PM
To: Pelton, David <David.Pelton@nrc.gov>
Subject: [External_Sender] Temporary Exemptions

Hello David,

This is to formally request relief from some regulatory requirements due to the Coronavirus (COVID 19) crisis. Our license number is 21-01333-01 expiring on February 29, 2024. Access to many areas of our hospitals is now restricted as units are re-purposed for caring for COVID patients. Routine procedures have been canceled and staff has been redeployed, laid off, or told to work from home. Until things have stabilized and return to some semblance of "normal", it may not be feasible to complete all of the routine functions we normally perform for compliance in a timely manner. Specifically, we are asking for 90 day extensions with the option to extend longer if needed for the following requirements:

35.60(b) The requirement in 10 CFR 35.60 (b) that the licensee calibrate the instrumentation required in 10 CFR 35.60(a) in accordance with nationally recognized standards or the manufacturer's instructions.

35.61(a) The requirement in 10 CFR 36.61(a) that the licensee calibrate survey instruments used to show compliance with 10 CFR Parts 20 and 35 annually.

35.67(b)(2) The requirement in 10 CFR 35.67(b)(2) that the licensee test sealed sources and brachytherapy sources for leakage at intervals approved by the Commission or an Agreement State in the Sealed Source and Device Registry.

35.67(g) A licensee in possession of sealed sources or brachytherapy sources, except for gamma stereotactic radiosurgery sources, shall conduct a semi-annual physical inventory of all such sources in its possession.

35.310(a) The regulation from which the licensee is requesting an exemption is the portion of 10 CFR 35.310(a) that requires licensees to provide radiation safety instruction at least annually to personnel caring for patients or human research subjects who cannot be released under 10 CFR 35.75.

These exemptions all seem to have some prior approval and the safety risk is minimal. We hope to be able to complete all tasks as usual but this is not guaranteed under the current circumstances. Therefore, we wish to ask for the temporary exemptions as listed. We want this to apply to Beaumont Royal Oak, Troy, and Grosse Pointe hospitals as well as the affiliated out-patient medical centers as listed on our license.

Thank you.
Sheila

Sheila Shaffer, MS, CNMT
Corporate Radiation Safety Officer/Radiation Safety
Beaumont Health/3711 West 13 Mile Rd/Royal Oak, MI 48073
Phone: (248)551-1086 or 11086
Pager: (248)995-8888
Fax: (248)551-8297
Sheila.Shaffer@beaumont.org

Beaumont

Jose Rivera
VP Clinical Operations, Administration
Beaumont Health/3711 West Thirteen Mile Rd/Royal Oak, MI 48073

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