



Jackson Cardiology Consultants, PLLC

Tareq Baghal M.D.,FACC SCAI, Bischan Hassunizadeh M.D., FACC - Rajendra Mehta MD, MS, FACC,-
Hussein Othman MD FACC, Jashu Patel MD,FACC

205 Page Avenue
Jackson MI. 49201
517-787-3577

June 24, 2020

United States Nuclear Regulatory Commission

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

Re: Amendment to NRC License # 21-26715-01
Jackson Cardiology Consultants, PLLC

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 or by phone at 734-662-3197.

Respectfully Yours,

Tareq Baghal, MD
Owner

RECEIVED AUG 25 2020



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RSO / EXECUTIVE MANAGEMENT LETTER OF UNDERSTANDING

June 24, 2020

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,

Radiation Safety Officer
James M. Botti, MS

Executive Management
Tareq Baghal, MD

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).

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FROM: Jackson Cardiology Consultants
205 Page Avenue
Jackson MI 49201

TO:
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Commission
2443 Warrenville Rd. Ste 210
Lisle, IL 60532-4352

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