

**From:** [Mccloggan, Curtis](#)  
**To:** [Gallagher, Robert](#)  
**Cc:** [Clavel, Arely](#)  
**Subject:** [External\_Sender] RE: [EXTERNAL] Request for Additional Information - St. Vincent's Medical Center Amendment Request, Mail Control No. 623261  
**Date:** Thursday, October 8, 2020 11:42:29 AM  
**Attachments:** [image001.png](#)

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Hi Bob,

My response to your questions are noted.

1. You have requested that Arely Clavel, M.S., be named Radiation Safety Officer (RSO) on your license. It appears that this individual may be an outside consultant/contractor. If this is so, in support of this request, please address the following:

a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.

Response: The radiation safety officer is responsible for managing the radiation safety program, identifying radiation safety problems, initiating, recommending or providing corrective actions, verifying implementation of corrective action and ensuring compliance with NRC Rules and regulations. The radiation safety officer is hereby delegated the authority necessary to meet these responsibilities. The radiation safety officer will also meet these responsibilities. The radiation officer will also assist the radiation safety committee in the performance of its duties.

b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.

Response: There is a contract that exist that details the cost of Medical Physics and Radiation Safety Officer services. The costs are predetermined and are paid quarterly to LMP for the consultant-RSO.

c. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).

Arely Clavel will have dedicated on-site time of 16 hours (2 days per month) Arely also can make herself available as needed additionally to that time. On average Arely is at the facility at least twice a month for on-site physics services (outside of the dedicated RSO days) and can allot time as needed on those visits.

c. Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.

Response: Kerriane Kraft who is the Nuclear Medicine Coordinator and

Radiation Badge Coordinator, will serve as the point of contact during the RSO's absence.

- e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.

Arely is available by phone, email, or on-site. Arely, at most, is a 30 min drive from the facility in the event of an emergency. Arely will respond to any call or email within the same day. In the event Arely is not available Greg Hisel who is also local to the area can step in during Arely's absence.

Thank You  
CM

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