



November 20, 2020

**United States Nuclear Regulatory Commission**

Region III, Office of Materials Licensing  
2443 Warrenville Road  
Suite 210  
Lisle, IL 60532-4352

**RE: RSO Availability and Ability to Perform Duties**

To Whom It May Concern:

Please find the information listed below concerning my availability and ability to perform RSO duties at this facility.

**Item #1:** My position at Medical Physics Consultants allows me adequate time and flexibility to address both my contractual and regulatory obligations to any facility that I am currently listed as the Radiation Safety Officer.

The position of Radiation Safety Officer is what we are contracted for by these facilities. All facilities have a signed contract by both them and Medical Physics Consultants. These contracts clearly outline both my responsibilities and the facilities. All facilities have also signed a RSO / Management Agreement form which has been forwarded to the NRC in all applications and / or amendments.

I am a board certified by the American Board of Radiology in Medical Nuclear Physics, Diagnostic Radiological Physics. Additionally I am certified by the American Board of Medical Physics in Medical Health Physics. I have over 30 years of experience in Nuclear Medicine. This is my livelihood and my occupation.

All facilities are audited on a quarterly basis which is standard of practice. These audits are forwarded to both management and the supervising technologist. These audits are reviewed and signed by both of these individuals. Any items that require attention are documented by the supervising technologist.

Please review the previous inspection history of any facility that I have been listed as the Radiation Safety Officer and you will find that I have an excellent track record with respect to compliance to NRC regulations.



**Item #2:** The amount of time for me to respond to an emergency involving radioactive material will vary depending upon my activities that day. Typically I would be able to respond immediately by phone. All facilities have both my cell phone and office phone numbers. The office staff at Medical Physics Consultants has a copy of my daily schedule at all times. The staff has phone numbers to any location that I might be working.

Medical Physics Consultants has an answering service that operates 24 hours a day, 7 days a week, 365 days a year. They have phone numbers for my home, cell and office. If for some reason they are not able to contact me, they have a list of other physicists that are employed by Medical Physics Consultants to contact. These individuals are also board certified physicists with a great deal of expertise. This same mechanism has been in place for years whenever one of our facilities is in need of immediate expertise and advice. If we are contacted for a radiological emergency we direct the account to notify the appropriate management individual.

As stated earlier we audit the program quarterly, any unsafe practices or incidents are reported to management in writing. Items of significant concern are always reported to management verbally in addition to the written documentation.

**Item #3:** The amount of time that I will spend at this facility will vary. Time will depend upon the status of the Radiation Protection Program and other variables. As stated above quarterly reports are sent to management.

**Item #4:** All individuals who handle or have access to radioactive material are overseen by a supervisor. These supervisors reports directly to management and the Radiation Safety Officer. All individuals are in-serviced yearly. Management in their license application have committed to supplying the necessary resources for these individuals to achieve regulatory compliance. Additionally, they have committed to this in the RSO / Management Agreement letter.

If you have any questions or if I may be of assistance, please contact me by phone at (734) 662-3197 or by e-mail at [jbotti@mpcphysics.com](mailto:jbotti@mpcphysics.com).

Respectfully Yours,

A handwritten signature in black ink, appearing to read 'J. Botti', with a stylized flourish at the end.

James M. Botti, MS  
Radiological Physicist  
Board Certified, ABR, ABMP

## Song, Taehoon

---

**From:** Kennedy, Erin  
**Sent:** Friday, November 20, 2020 1:13 PM  
**To:** Pavon, Sandy; Song, Taehoon  
**Subject:** FW: RE: Jackson Cardiology Consultants, PLLC  
**Attachments:** J. Botti RSO Availability and Ability to Perform Duties11-20-2020.pdf

Good Afternoon!!

Will you add the attached document to ADAMS.

Licensee: Jackson Cardiology Consultants, PLLC

LN 21-26715-01  
DN 030-34118  
CN 622844

Thanks!

Erin

---

**From:** Jim Botti <[jbotti@mpcphysics.com](mailto:jbotti@mpcphysics.com)>  
**Sent:** Friday, November 20, 2020 12:15 PM  
**To:** Kennedy, Erin <[Erin.Kennedy@nrc.gov](mailto:Erin.Kennedy@nrc.gov)>  
**Subject:** [External\_Sender] RE: Jackson Cardiology Consultants, PLLC

Good Afternoon Erin

Please find the attached document responding to your request for additional information.

If you have any questions regarding this email please contact me. Thank You

James M. Botti, MS  
Board Certified ABR, ABMP

Office: 734-662-3197  
Fax: 734-662-9224  
Cell: 810-599-8817



---

**From:** Kennedy, Erin [mailto:[Erin.Kennedy@nrc.gov](mailto:Erin.Kennedy@nrc.gov)]  
**Sent:** Thursday, November 19, 2020 2:40 PM

**To:** Jim Botti

**Subject:** Jackson Cardiology Consultants, PLLC

Good Afternoon Jim,

I was just wrapping up my review of Jackson Cardiology and I need confirm some information regarding your availability as a consultant RSO in accordance with NUREG 1556 vol. 9 rev. 3. For your convenience you may provide your answers to the following questions in an email.

Please provide the following:

- a description of how you will allocate time to permit the performance of the duties of RSO
- the minimum amount of you plan to spend onsite
- describe your overall availability of the to respond to questions or operational issues that arise during the conduct of operations
- provide the amount of time it will take for you to respond to the facility in the event of an emergency.

Please let me know if you have any questions.

Thanks,

*Erin Kennedy*

U.S. Nuclear Regulatory Commission, Region III

Health Physicist- Materials Licensing

Email: [erin.kennedy@nrc.gov](mailto:erin.kennedy@nrc.gov)

Office: 630-829-9876