



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

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

May 6, 2022

Aaron M. Lewis, M.D.  
Radiation Safety Officer  
Midwest Division - LSH, LLC  
d/b/a Lee's Summit Hospital  
2100 S.E. Blue Parkway  
Lee's Summit, MO 64063

Dear Dr. Lewis:

This letter is in reference to the application dated January 26, 2022, signed by Gabriel A. Clements, COO, requesting the renewal of your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 24-24660-01.

The U.S. NRC's guidance document applicable to your licensed operations, which I refer to throughout this letter as "the guidance", is NUREG-1556, Volume 9, Rev. 3, dated September 2019, "Consolidated Guidance About Materials Licenses: Program – Specific Guidance About Medical Use Licenses." This guidance is available on the NRC Web site at: <https://www.nrc.gov/docs/ML1925/ML19256C219.pdf>

Upon review of your request, I identified the following areas requiring additional or clarifying information:

1. Section 8.7.1, "Radiation Safety Officer," of the guidance identifies that the Radiation Safety Officer (RSO) is responsible for the oversight of licensed operations. The RSO must have sufficient organizational authority and management prerogative to enforce appropriate radiation protection rules, standards, and practices.

Submit an updated delegation of authority supporting your continuing appointment as RSO. Appendix I, "Radiation Safety Officer Duties, Responsibilities, and Delegation," of the guidance includes an example delegation of authority on page I-4. Note that the delegation of authority should be signed by the RSO and a management representative. Include the printed name, title and date for each individual signing.

2. A check with the Missouri Division of Professional Registration was not successful in verifying the active licensure of the following Authorized Users:

<u>Physician Name</u>	<u>License Number</u>	<u>Expiration Date</u>
Rick S. Moritz, M.D.	2004033203	7/3/2019
Robert A. Wood, Jr., M.D.	114273	1/31/2022
Bimal B. Patel, D.O.	2017014792	1/31/2021

Please provide evidence that each of above Authorized Users has a valid medical license from the Missouri Division of Professional Registration. Further, please confirm that all other requested Authorized Users continue to be actively licensed with the Missouri Division of Professional Registration.

3. Resubmit your facility diagram, expanding on the level of detail and clarity in accordance with Section 8.9.1, "Facility Diagram," of the guidance. Specifically, please provide the following:
- Indicate the address on the facility diagram or drawing.
  - Identify all areas/rooms where licensed radioactive material will be received, stored and used (e.g., imaging room, stress/treadmill room, injection room, etc.).
  - Provide the dimensions/scale for the areas/rooms where radioactive material will be received, stored and used. The direction of north should be indicated.
  - Describe adjacent areas/rooms to the areas where radioactive material will be received, stored and used (e.g. hallways, outside/exterior, labs, waiting room, hallway, office, etc.).
  - Describe the area above and below areas/rooms where radioactive material will be received, stored and used.
  - Describe/label details such as sinks, dose calibrator, L-block, shielded cave, fume hood, material receipt area and waste storage inside the hot lab.
  - Describe the availability of additional equipment used for handling and storing radiopharmaceutical therapy dosages, as applicable.
  - Describe measures to secure radioactive material (e.g. describe or label locking doors, cabinets or containers, etc.)

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) §2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

To continue review of your request, please submit your response to this letter within 30 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. I will assume that you do not wish to further pursue this licensing action if I do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, I encourage you to contact me at (630) 829-9737 or via e-mail at [Jason.Kelly@nrc.gov](mailto:Jason.Kelly@nrc.gov).

Sincerely,

Jason M. Kelly, MPH  
Health Physicist  
Materials Licensing Branch

Docket No.: 030-29074  
License No.: 24-24660-01  
Control No.: 630033