



RCHP Billings-Missoula LLC dba Community Medical Center  
25-18361-01  
030-14921  
632201

2827 Fort Missoula Road  
Missoula, MT 59804

TEL (406) 728-4100  
www.communitymed.org

From day one.

August 16, 2022

Carol Hill  
Licensing Assistant  
U.S. Nuclear Regulatory Commission, Region IV  
1600 East Lamar Boulevard  
Arlington, Texas 76011-4511

Dear Carol:

This letter serves as a written request to make the following changes to the Materials License No. 25-18361-01, RCHP Billings – Missoula LLC dba Community Medical Center:

- 1) Add the following two physicians as Authorized Users under 10 CFR 35.1000 only for Pd-103 and I-125 radioactive seed localization: Joel A. Brake, M.D. & Elizabeth Joiner, M.D. Please find attached copies of their training and experience.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Adam Davis".

Adam Davis, MS, DABR  
Radiation Safety Officer  
Community Medical Center

Encl.

PRECEPTOR ATTESTATION:

I attest that Dr. Joel Brake has performed three (3) cases for Radioactive Seed Localization (RSL) under my supervision as an authorized user on 2/28/2019, 5/7/2020, 10/18/2021 with the following supervised work experience:

1. Performed radiation surveys as needed using proper instrumentation.
2. Implanted sealed sources safely, including the use of handling tools to manipulate seeds and the proper use of shields, if needed.
3. Monitored the routine use of sealed sources before, during and after the procedure.

Additional training included instruction on the following topics:

1. Applicable regulations
2. RSL program policies and procedures
3. Radiation safety (source handling) issues
4. Inventory and security of radioactive seeds
5. Implanting and removing RSL sources safely
6. Performing surveys with a survey meter
7. Emergency procedures, including how to respond to a lost or leaking source.

Joel Brake, MD is already on NRC RAM license #25-18361-01 as an Authorized User for 35.100 and 35.200 and is therefore well experienced in radiation safety and now has achieved a level of competency sufficient to function independently as an authorized user for RSL procedures covered in 10 CFR 35.1000.

Name of Proctor: Michael Stewart, M.D.

Signature:



Date:





From day one.

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Missoula, MT 59804

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### PRECEPTOR ATTESTATION:

I attest that Elizabeth Joiner, MD has performed at least three (3) cases for Radioactive Seed Localization (RSL) under my supervision as an authorized user (AU). The dates of the training were between:

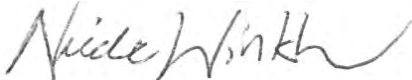
July 1, 2015 and June 30, 2019

The supervision encompassed work experience including:

- 1) Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation protection surveys;
- 2) Characteristics, preparation, safe handling, precautions, and labeling of radioactive seeds and needles containing radioactive seeds. Proper methods for storage, inventory and disposal of sealed sources including decay in storage program;
- 3) Using administrative controls to prevent a medical event;
- 4) Instruction on procedures to safely mitigate contamination from a leaking, damaged or ruptured sealed source;
- 5) Routine monitoring before, during and after all uses of the seeds to account for all seeds specified in the prescription and to ensure rapid identification and remediation of a damaged, ruptured, lost/missing or leaking source;
- 6) Proper use and maintenance of appropriate instrumentation (i.e. intraoperative gamma probe) to identify the location of implanted seed(s) for excision;
- 7) Training provided by an RSL preceptor AU to include performing the related radiation surveys using the appropriate instrumentation to identify the location of an implanted seed(s) for excision.
- 8) Identifying radioactive seed appearance, characteristics, including radiation safety and handling procedures and precautions;
- 9) Emergency procedures, including how to respond to a leaking source.

Dr. Joiner is an AU on NRC RAM License No. 25-18361-01 for 35.100, 35.200 and oral administration of sodium iodide I-131, is therefore well experienced in radiation safety and now has achieved a level of competency sufficient to function independently as an AU for RSL procedures covered in 10 CFR § 35.1000.

Preceptor: Nicole Winkler, MD

Signature: 

Date: 5/2/2022

**From:** [Adam Davis](#)  
**To:** [Hill, Carol](#)  
**Cc:** [Kimberly Ryan-O'hara \(KRyanOhara@communitymed.org\)](#)  
**Subject:** [External\_Sender] Amendment Request for 25-18361-01  
**Date:** Tuesday, August 16, 2022 11:21:33 AM  
**Attachments:** [Outlook-4vo0wfkc.png](#)  
[25-18361-01 Amend Request 2022-08-16.pdf](#)

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Good morning Carol,

Please see attached for an amendment request for Material License No. 25-18361-01, RCHP Billings - Missoula LLC dba Community Medical Center.

Please don't hesitate to contact me with any questions or concerns.

Thank you,

**Adam Davis, MS, DABR**  
Radiation Safety Officer  
**COMMUNITY MEDICAL CENTER**  
971-401-0575 Phone  
406-327-4582 Fax



From day one.