



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD – SUITE 102
KING OF PRUSSIA, PA 19406-1415

September 21, 2022

Tim Martin, Chief Operating Officer
Cabell Huntington Hospital
1340 Hal Greer Boulevard
Huntington, WV 25701

**SUBJECT: CABELL HUNTINGTON HOSPITAL, REQUEST FOR ADDITIONAL
INFORMATION, MAIL CONTROL NO. 632252**

Dear Tim Martin:

This is in reference to your letter dated August 23, 2022, requesting to amend NRC License No. 47-00404-02. In order to continue our review, we need the following additional information:

1. Please describe any changes to Cabell Huntington Hospital's Radiation Safety Committee and Radiation Safety support that will result from the addition of Pleasant Valley Hospital's licensed activities and locations of use to your license. Additionally, please identify what type of involvement Pleasant Valley Hospital will have with the Cabell Huntington Hospital Radiation Safety Committee.
2. Please describe the Pleasant Valley Hospital leadership structure in relationship to Cabell Huntington Hospital and Mountain Health Network. Additionally, please describe any changes to the Cabell Huntington Hospital reporting structure based on this transaction.
3. Please describe the role of the Pleasant Valley Hospital Board of Trustees and their authority over licensed activities at Pleasant Valley Hospital. Please describe the relationship between the Pleasant Valley Hospital Board of Trustees, Cabell Huntington Hospital, and Mountain Health Network.
4. NRC Inspection Report 03003370/2021001 (ML22173A063) identified several apparent violations. An apparent violation of 10 CFR 20.1101(a) was associated with the failure to develop and implement a radiation protection program that was commensurate with the scope and extent of licensed activities and sufficient to ensure compliance with the provisions of 10 CFR Part 20. An apparent violation of 10 CFR 35.24(g) involved your failure to provide sufficient management prerogative to your Radiation Safety Officer (RSO) to identify radiation safety problems or stop unsafe operations.
 - a. Please describe how your radiation protection program will incorporate the licensed activities at Pleasant Valley Hospital and how you will determine whether it is sufficient to ensure compliance with the provision of 10 CFR Part 20.
 - b. Please describe how you will ensure that the RSO has sufficient management prerogative to identify radiation safety problems or to stop

unsafe operations associated with licensed activities at Pleasant Valley Hospital.

5. Please describe how written radiation safety policies and procedures at Cabell Huntington Hospital and Pleasant Valley Hospital will be reviewed for inconsistencies and revised, if applicable. Additionally, please confirm that training, commensurate with assigned job duties, will be provided regarding any changes to written radiation safety policies and procedures and provide a time frame for completing this training (if required)

6. Letters dated May 21, 2013 (ML13143A162) and June 19, 2017 (ML17181A359) and application dated July 29, 2013 (ML13217A406) establish that the radiation safety officer, James Norweck, will provide a combined average of 12.5 hours of on-site time per week at currently licensed Cabell Huntington Hospital facilities. Specifically, the letters state that six hours per week will be spent on-site at Cabell Huntington Hospital, six hours per week will be spent on-site at St. Mary's Medical Center, and four to six hours per quarter will be spent on-site at Huntington Internal Medicine Group. Please provide responses to the following, with respect to the addition of Pleasant Valley Hospital's licensed activities and locations of use to your license:

a. Identify the commitments of James Norweck for other NRC or Agreement States licensees, including any Master Materials Licenses, along with a description of how James Norweck will allocate time to permit the performance of the duties of the RSO, as described in the regulations. Additionally, state James Norweck's minimum amount of on-site time for all licensed activities associated with Cabell Huntington Hospital, including Pleasant Valley Hospital (hours per week or days per quarter, as appropriate for the size of the program).

b. Describe the overall availability of James Norweck to respond to questions or operational issues that arise during the conduct of the radiation safety program and related regulatory requirements.

c. Specify the maximum amount of time it will take James Norweck to arrive at all currently licensed facilities and Pleasant Valley Hospital, in the event of an emergency that requires his presence.

7. Letter dated May 21, 2013 (ML13143A162) identifies C. Thomas Brannan, MS, DABR as the in-house representative who will serve as the point of contact during the radiation safety officer's absence at St. Mary's Medical Center. Application dated July 29, 2013 (ML13217A406) identifies C. Thomas Brannan, MS, DABR and Tina Shoemaker, CNMT, as the in-house representatives who will serve as the point of contact during the radiation safety officer's absence at Cabell Huntington Hospital. Additionally, letter dated June 19, 2017 (ML17181A359), identifies Juanita Dempsey as the in-house representative who will serve as the point of contact during the radiation safety officer's absence at Huntington Internal Medicine Group.

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Please confirm that these individuals are currently identified as the in-house representatives who will serve as the point of contact during the radiation safety officer's absence. Alternatively, you may submit the name(s) of an individual(s) to act as the in-house representative who will serve as the point of contact during the radiation safety officer's absence. Additionally, please identify an in-house representative who will serve as the point of contact during the radiation safety officer's absence for licensed activities and licensed locations of use at Pleasant Valley Hospital. Any RSO duties that the in-house representative will be helping the RSO with should be clearly defined.

8. In your letter dated August 23, 2022, you requested David Abramowitz, M.D., Adam T. Krompecher, M.D, Jane Maloof, M.D., and Daniel A. Rodgers, M.D. to be added to your license as Authorized Users. The license you referenced that they are currently authorized on, NRC License No. 47-17745-01, was terminated in May of 2015. Since this is a period of more than 7 years from your amendment request, the individual's recentness of training has not been established. Please submit documentation supporting their training and experience or submit a license that was active within the last 7 years listing them as an authorized user for the uses listed in the above referenced letter to demonstrate recentness of training.

We will continue our review upon receipt of this information. Please reply to my attention at:

Patrick-John Hann
Mail Control No. 632252
USNRC, Region I
Division of Radiological Safety and Security
475 Allendale Road, Suite 103
King of Prussia, PA 19406

Or

R1DRSSMail.Resource@nrc.gov
Reference – Patrick-John Hann
Mail Control No. 632252

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding medical uses of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/med-use-toolkit.html>. This site also provides the updated Training and Experience NRC Form 313A series of forms and guidance, as well as information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at:

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<http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, via electronic mail at Patrick-John.Hann@nrc.gov.

Thank you for your cooperation.

Sincerely,

Patrick-John Hann, Health Physicist
Medical and Licensing Assistance Branch
Division of Radiological Safety and Security
Region I

License No. 47-00404-02
Docket No. 030-03370
Mail Control No. 632252

cc: James Norweck, Radiation Safety Officer

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CABELL HUNTINGTON HOSPITAL, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 632252 DATED SEPTEMBER 21, 2022

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SUNSI Review Complete: PJHANN

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DATE	9/20/2022		9/20/2022					

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