WVUMedicine

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January 27, 2023

Robin L Elliott
Senior Health Physicist
Medical & Licensing Assistance Branch
Division of Radiological Safety and Security
U.S. Nuclear Regulatory Commission, Region 1
475 Allendale Road – Suite 102
King of Prussia, PA 19406-1415

Dear Ms. Elliott,

This letter is in response to your email request for additional information dated January 18, 2023, regarding amendment of West Virginia University Hospitals, Inc. License No. 47-23066-02, Docket No. 030-20233.

1. Describe the individual's on-the-job or formal training, including the location and duration of the training for the proposed RSO that demonstrates the individual is qualified to perform the duties required under the license. Training should cover (a) principles and practices of radiation protection, (b) radioactivity measurements, standardization, and monitoring techniques and instruments (c) mathematics and calculations basic to the use and measurement of radioactivity, and (d) biological effects of radiation.
    - The RSO completed two formal 40-hour training courses designed for Radiation Safety Officers presented by Radiation Safety Academy and Oak Ridge Associated Universities. In addition, the RSO has received more than 20 years of on-the-job training at West Virginia University. These formal RSO courses and on-the-job training covered: principles and practices of radiation protection; radioactivity measurements, standardization, and monitoring techniques and instruments; mathematics and calculations basic to the use of measurement of radioactivity; and biological effects of radiation.
2. Address the RSO's experience in performing each of the duties listed in the "Duties and Responsibilities" section of 8.7.3, when and where the experience was gained, and the type, form, and quantity of the radionuclides involved.
    - The RSO has extensive experience in performing each of the duties and responsibilities of the RSO listed below. The experience was gained from 2002 to present at West Virginia University (License No. 47-23035-01) and West Virginia University Hospitals, Inc (License No. 47-23066-02). The type, form, and quantity of radionuclides involved includes sealed and unsealed byproduct material used for diagnostic and therapeutic purposes, in-vivo human studies, instrument calibration, student instruction, and in-vitro studies in millicurie and curie quantities.
        - o Monitoring and surveys of all areas in which radioactive material is used

o Overseeing ordering, receipt, surveys, and delivery of byproduct material
o Packaging, labeling, surveys, etc., of all shipments of byproduct material leaving the institution
o Monitoring programs, including determining the need for and evaluating bioassays, monitoring personnel exposure records, and developing corrective actions for those exposures approaching maximum permissible limits
o Developing and implementing an ALARA program
o Training all personnel
o Overseeing the waste disposal program
o Monitoring inventory and leak tests of sealed sources
o Overseeing decontamination
o Investigating incidents, responding to emergencies and notifying the appropriate agencies
o Maintaining all required records

• In addition, the RSO has experience participating in the development and implementation of a security program for radioactive material in accordance with 10 CFR Part 37. This experience was gained from 2013 to 2016 at West Virginia University (License No. 47-23035-01) and from 2013 to present at West Virginia University Hospitals, Inc (License No. 47-23066-02). The type, form and quantity of radionuclides involved includes sealed sources of byproduct material used for therapeutic purposes, in-vivo human studies, and in-vitro studies in curie quantities.

If any additional information is needed, please contact Stephen Root at 304-293-3413 or sroot@hsc.wvu.edu.

Sincerely,

Nathan Burt
Vice President of Operations

Cc: Radiation Safety Committee