



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

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

January 11, 2024

William Skiles, M.D.  
Radiation Safety Officer  
Norton – King’s Daughters’ Health, Inc.  
1373 E. State Rd. 62  
Madison, IN 47250

Dear Dr. Skiles:

This letter is regarding your request dated November 20, 2023, for an amendment to your U.S. Nuclear Regulatory Commission (NRC) Materials License No. 13-18692-01.

The U.S. NRC’s guidance document for your type of license, which I refer to below 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 U.S. NRC website at:

<https://www.nrc.gov/docs/ML1925/ML19256C219.pdf>

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

1. Section 8.7.1, “Radiation Safety Officer (RSO) and Associate Radiation Safety Officers (ARSOs),” of the guidance, identifies that the 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 a delegation of authority supporting the appointment of the proposed 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. Section 8.7.1, “Radiation Safety Officer (RSO) and Associate Radiation Safety Officers (ARSOs),” of the guidance, includes a listing of typical duties and responsibilities of the appointed RSO. Among the listing of the typical duties and responsibilities of the RSO is interacting with the U.S. NRC. To facilitate such interactions, please provide applicable contact information for the proposed RSO, including all of the following as applicable:

- office phone number;
- mobile phone number;
- fax number; and
- e-mail address.

The U.S. NRC primarily corresponds and furnishes documentation to licensees through e-mail correspondence. Therefore, the provision of an e-mail address is especially helpful in ensuring timely communications from the agency.

3. Section 8.7.1, "Radiation Safety Officer (RSO) and Associate Radiation Safety Officers (ARSOs)," of the guidance, describes that an Authorized User identified on the license may be identified as an RSO, consistent with the individual's training and experience in accordance with [Title 10 of the Code of Federal Regulations \(10 CFR\) §35.50\(c\)](#).

The guidance specifies that for an Authorized User qualifying under [10 CFR §35.50\(c\)\(2\)](#), the following should be provided:

- a copy of the U.S. NRC Materials License or Agreement State identifying the proposed RSO as an Authorized User;
- documentation of the training and experience specified in [10 CFR §35.50\(d\)](#) demonstrating that the proposed RSO is qualified by training in radiation safety, regulatory issues, and emergency procedures for the types of use authorized in the license; and
- if applicable, documentation of recent, related continuing education and experience, as required by [10 CFR §35.59](#).

Your request did not include required documentation of the proposed RSO's training and experience specified in [10 CFR §35.50\(d\)](#) demonstrating that the proposed RSO is qualified by training in radiation safety, regulatory issues, and emergency procedures for the types of use authorized in the license.

Therefore, please provide a written attestation as prescribed in 10 CFR 35.50(b)(2), signed by a preceptor RSO or ARSO, identifying that the proposed RSO has successfully completed the required training and experience in radiation safety, regulatory issues, and emergency procedures for all types of use authorized in your license and is able to independently fulfill the radiation safety-related duties as an RSO for a medical use licensee.

In accordance with [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 15 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, CPH  
Health Physicist  
Materials Licensing Branch

Docket No.: 030-14051  
License No.: 13-18692-01  
Control No.: 637988