

Michael Fernald, MS, DABR Wyoming Cardiopulmonary Services, PC. 1230 East First St. Casper, WY 82601 208-596-1677 mfernald@rockymountainoncology.com

June 12, 2024

Casey Alldredge, Health Physicist Materials Licensing Branch Division of Radiological Safety & Security U.S. Nuclear Regulatory Commission, Region IV 1600 E. Lamar Blvd. Arlington, TX 76011-4511

Subject: Amendment Request to Appoint Radiation Safety Officer for RAM License No. 49-27711-01

Dear Ms. Alldredge,

Thank you for the opportunity to respond to some additional questions.

Request:

Resend the amendment request letter with Joan or another hospital manager's signature added as well.

Response:

Please find a copy signed by Ms. Joan Brown attached to this email.

Request:

Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in regulations. State the consultant-RSO's minimum amount of onsite time (hours per week or days per quarter, as appropriate for the program).

Response:

Consultant-RSO Commitments:



I currently serve as the Radiation Safety Officer (RSO) at two other facilities:

- 1. Rocky Mountain Oncology Center:
 - a. Primary Employer: Rocky Mountain Oncology Center
 - b. Location: Casper, WY
 - c. On-site Presence: I am typically on-site four to five days per week as part of my overall duties as Lead Medical Physicist and RSO
 - d. Responsibilities: As the RSO, I oversee the radiation safety program, review badge readings, provide training to staff, and perform other duties as required to ensure compliance with NRC regulations
- 2. Wyoming Medical Center:
 - a. Location: Casper, WY
 - b. On-site Presence: I am on-site typically one day per week
 - c. Responsibilities: In my role as RSO, I manage the radiation safety program, conduct safety audits, monitor badge readings, and other duties as required to ensure compliance with NRC regulations

Time Allocation for Wyoming Cardiopulmonary Services, PC:

For Wyoming Cardiopulmonary Services, PC, I will allocate sufficient time to fulfill the responsibilities of the RSO as outlined in NRC regulations. Specifically:

- Location: Casper, WY, which allows me to provide prompt assistance if needed, such as in the event of a spill or other emergency.
- On-site Presence: I will be on-site a minimum of six days per quarter
- Availability: I will be available during the regular business work week via phone, text, and email to address any immediate concerns or issues.

Description of Duties:

As the RSO for Wyoming Cardiopulmonary Services, PC, I will perform the following duties:

- Oversee the radiation safety program
- Review and monitor badge readings
- Conduct regular safety audits and inspections
- Provide training and support to staff regarding radiation safety practices
- Ensure compliance with NRC regulations

Given that Wyoming Cardiopulmonary Services, PC is a small program, licensed for only 35.200 activities, the time commitment required is manageable alongside my other RSO roles. My proximity and availability will ensure the adequate performance of my duties as RSO for Wyoming Cardiopulmonary Services, PC.



Request:

Identify an in-house representative who will be the point of contact during the RSO's absence.

Response:

The Practice Administrator, currently Ms. Joan Brown, or Nuclear Medicine Technologist, currently Ms. Alicia Heiserman, will be the points of contact during the RSO's absence.

Request:

Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of the radiation safety program and related regulatory requirements.

Response:

Overall Availability:

As the consultant-RSO for Wyoming Cardiopulmonary Services, PC, I am committed to being readily available to address any questions or operational issues related to the radiation safety program and related regulatory requirements. My availability includes:

- Regular Business Hours: I will be available during regular business hours to respond to inquiries and address operational issues.
- Contact Methods: I can be reached via phone, text, and email to provide prompt assistance and guidance.
- On-site Presence: I will be on-site at least six days per quarter, ensuring direct oversight and support for the radiation safety program.

Handling Periods of Unavailability:

Recognizing that there may be periods when I am unavailable due to vacations or other personal commitments, the following measures will be in place to ensure continuous support:

• Advanced Notice: I will provide advanced notice to Wyoming Cardiopulmonary Services PC staff regarding any planned absences.



- Alternate Contact: During my absence, I will designate an alternate contact person qualified to handle urgent matters and provide interim support. This individual will be briefed on the specific needs and operations of the Wyoming Cardiopulmonary Services PC radiation safety program.
- Emergency Protocols: Clear protocols and contact information will be provided in case of an emergency to ensure that immediate assistance can be obtained if needed.

By implementing these measures, I am confident that Wyoming Cardiopulmonary Services PC will continue to operate effectively and comply with all regulatory requirements, even when I am unavailable.

Request:

Specify the maximum amount of time it will take the consultant-RSO to arrive at the facility in the event of an emergency that requires his/her presence.

Response:

In an emergency requiring my presence at Wyoming Cardiopulmonary Services PC, I am typically available to respond immediately. However, there may be occasions when I am located up to a few hours away due to professional or personal commitments.

Specifically:

- Immediate Availability: Under normal circumstances, I am based in Casper, WY, and can respond to the facility without delay.
- Extended Response Time: On occasions when I am not immediately local, my maximum response time to arrive at the facility would be within a few hours, depending on my exact location and travel conditions.

This ensures that I can provide timely and effective support in an emergency while also recognizing the practicalities of occasional travel and other commitments.

Thank you.

Sincerely,

The Fre

Michael Fernald, MS, DABR Wyoming Cardiopulmonary Service, PC



Michael Fernald, MS, DABR Wyoming Cardiopulmonary Services, PC. 1230 East First St. Casper, WY 82601 208-596-1677 mfernald@rockymountainoncology.com

June 5, 2024

U.S. Nuclear Regulatory Commission, Region IV Division of Nuclear Materials Safety Attn: Licensing 1600 E. Lamar Blvd. Arlington, TX 76011-4511

Subject: Amendment Request to Appoint Radiation Safety Officer for RAM License No. 49-27711-01

Dear License Reviewer,

I am writing to request an amendment to the RAM License Number 49-27711-01 for Wyoming Cardiopulmonary Service, PC, located at 1230 East First St, Casper, WY 82601, to name myself, Michael Fernald, as the Radiation Safety Officer (RSO).

Professional Qualifications:

Current RSO Positions:

I am presently the RSO on the following licenses:

- License No. 49-00152-02
- License No. 49-29254-01

Authorized Medical Physicist:

I am an Authorized Medical Physicist on License No. 49-29254-01.

Certification:

• I am a Diplomate of the American Board of Radiology.

Experience and Training:

I possess experience in managing radiation safety programs, conducting safety audits, ensuring compliance with NRC regulations, and providing training to staff. My experience and qualifications include:



- Overseeing comprehensive radiation safety programs.
- Performing risk assessments and implementing safety protocols.
- Managing the use of radioactive materials in medical settings.
- Conducting quality control for radioactive sources and equipment.

To facilitate the transition and continued compliance with NRC regulations, please amend RAM License Number 49-27711-01 to appoint me as the RSO. Enclosed with this letter are the following documents to support this request:

- NRC Form 313A (RSO) completed with my qualifications.
- Copies of current licenses indicating my roles as RSO and AMP.
- Certification of my Diplomate status with the American Board of Radiology.
- Delegation of Authority.

Should you require any further information or documentation, please do not hesitate to contact me at 208-596-1677 or mfernald@rockymountainoncology.com.

Thank you for your consideration.

Sincerely,

The Fre

Michael Fernald, MS, DABR Wyoming Cardiopulmonary Service, PC

Enclosures:

NRC Form 313A (RSO) Copies of Current Licenses: 49-00152-02 and 49-29254-01 American Board of Radiology Certification Delegation of Authority

WOWN

Joan Brown, Practice Administrator, Wyoming Cardiopulmonary Services, P.C. June 7, 2024

From:	Joan Brown
То:	Casey Alldredge; Michael Fernald
Subject:	[External_Sender] RE: Re: Re: Wyoming Cardiopulmonary - NRC License Amendment - Request for Information
Date:	Wednesday, June 12, 2024 9:46:29 AM
Attachments:	image002.png
	image001.png
	image005.png
	RSO Amendment RequestJB.pdf

Here is a resend. Since Adobe did updates, I've found it to be VERY glitchy!



Wyoming Cardiopulmonary Services, P.C. 1230 East First Street, Casper, Wyoming 82601 (307) 266-3174 1-800-445-3501 Fax: (307) 266-3177

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From: Casey Alldredge <Casey.Alldredge@nrc.gov>
Sent: Wednesday, June 12, 2024 8:43 AM
To: Michael Fernald <mfernald@rockymountainoncology.com>
Cc: Joan Brown <jbrown@wyoheart.com>
Subject: RE: Re: Re: Wyoming Cardiopulmonary - NRC License Amendment - Request for Information

Hmm, I was wondering if it was adobe being glitchy. Sometimes when that happens to me I "print" the doc to a new pdf and that fixes it.

From: Michael Fernald <<u>mfernald@rockymountainoncology.com</u>>

Sent: Wednesday, June 12, 2024 9:39 AM

To: Casey Alldredge <<u>Casey.Alldredge@nrc.gov</u>>

Cc: Joan Brown <jbrown@wyoheart.com>

Subject: [External_Sender] Re: Re: Wyoming Cardiopulmonary - NRC License Amendment - Request for Information

Hi Casey, I apologize - I do see it on my end.

Joan, would you be able to try and send it directly to Casey?

Michael Fernald

Lead Physicist



6501 E 2ND St. Casper, WY 82609-4293 Tel: <u>(307) 233-4708</u> Fax: <u>(307) 233-4700</u>

www.rockymountainoncology.com

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From: Casey Alldredge <<u>Casey.Alldredge@nrc.gov</u>>

Sent: Wednesday, June 12, 2024 8:35 AM

To: Michael Fernald <<u>mfernald@rockymountainoncology.com</u>>

Cc: Joan Brown <jbrown@wyoheart.com>

Subject: RE: Re: Wyoming Cardiopulmonary - NRC License Amendment - Request for Information

Michael, I don't see Joan's signature. I see where it looks like it is supposed to be but its blank. Do you see it on your end? Casey

From: Michael Fernald <<u>mfernald@rockymountainoncology.com</u>>
Sent: Wednesday, June 12, 2024 9:27 AM

To: Casey Alldredge <<u>Casey.Alldredge@nrc.gov</u>>

Cc: Joan Brown <<u>ibrown@wyoheart.com</u>>

Subject: [External_Sender] Re: Wyoming Cardiopulmonary - NRC License Amendment - Request for Information

Hi Ms. Alldredge,

Thank you for the opportunity to answer your additional questions. Please find attached a copy of the responses and a copy of a co-signed Amendment request letter. Please note that Ms. Brown signed the letter electronically. I appreciate your assistance.

Thank you, -Michael

Michael Fernald

Lead Physicist



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From: Casey Alldredge <<u>Casey.Alldredge@nrc.gov</u>>

Sent: Tuesday, June 11, 2024 12:49 PM

To: Michael Fernald <<u>mfernald@rockymountainoncology.com</u>>

Cc: Joan Brown <<u>ibrown@wyoheart.com</u>>

Subject: RE: Wyoming Cardiopulmonary - NRC License Amendment - Request for Information

Michael & Joan,

I need the information below in order to complete the license amendment and restore Wyoming Cardiopulmonary Services' compliance with the license conditions for the RSO. Please provide the information below as soon as possible. Thanks,

Casey Alldredge Health Physicist Materials Licensing Branch Division of Radiological Safety & Security Region IV, USNRC

From: Casey Alldredge <<u>Casey.Alldredge@nrc.gov</u>>
Sent: Thursday, June 6, 2024 6:38 AM
To: <u>mfernald@rockymountainoncology.com</u>

Subject: Wyoming Cardiopulmonary - NRC License Amendment - Request for Information

Good morning,

I reviewed your license amendment request and I have a couple of follow-up questions since you are a consultant RSO. Could you provide responses to the questions below in a signed pdf and can you also resend the amendment request letter with Joan or another hospital manager's signature added as well? If you have any questions, please let me know. Thanks,

□ Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of onsite time (hours per week or days per quarter, as appropriate for the program).

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From:	Michael Fernald
То:	Casey Alldredge
Cc:	Joan Brown
Subject:	[External_Sender] Re: Wyoming Cardiopulmonary - NRC License Amendment - Request for Information
Date:	Wednesday, June 12, 2024 9:27:32 AM
Attachments:	Outlook-100euy4f.png
	RSO Additional Questions.pdf
	RSO Amendment RequestJB.pdf

Hi Ms. Alldredge,

Thank you for the opportunity to answer your additional questions. Please find attached a copy of the responses and a copy of a co-signed Amendment request letter. Please note that Ms. Brown signed the letter electronically. I appreciate your assistance.

Thank you,

-Michael

Michael Fernald

Lead Physicist



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Casey Alldredge Health Physicist Materials Licensing Branch Division of Radiological Safety & Security Region IV, USNRC

From:	Joan Brown
То:	Casey Alldredge
Subject:	[External_Sender] Automatic reply: Wyoming Cardiopulmonary - NRC License Amendment - Request for Information
Date:	Tuesday, June 11, 2024 1:50:09 PM

I will be out of the office June 8 through June 11. I will have limited access to email. Thanks! Joan Brown, CMPE, MBA Practice Administrator

307-266-3174 extension 711

307-261-6711 Direct Line

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From:	Michael Fernald
То:	Casey Alldredge
Cc:	Joan Brown
Subject:	[External_Sender] Re: Wyoming Cardiopulmonary - NRC License Amendment - Request for Information
Date:	Wednesday, June 12, 2024 8:42:18 AM
Attachments:	image511074.png

Good morning Casey,

I hope your week is going well. I will have the finished responses to your additional questions this morning.

Thank you,

-Michael

Michael Fernald

Lead Physicist



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