

To:

Samantha Everett

Health Physicist

U.S. Nuclear Regulatory Commission, Region IV

Materials Licensing Branch

1600 East Lamar Boulevard

Arlington, TX 76011-4511

817-200-1124

From:

Harold Palmer M.C.E.,R.S.O.

Kuakini Medical Center

347 N. Kuakini Street

Honolulu, Hi 96817

808-226-1961

NRC License Renewal

53-17797-01

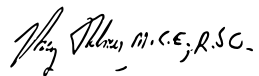
August 30, 2024

Dear Ms.Everett,

I'm attaching a response to your questions received this day.

Thank you for your attention.

aloha,



Harry Palmer M.C.E.,R.S.O.

The Nuclear Regulatory Commission (NRC) has completed the technical review of the renewal application dated March 12, 2024 for license number 53-17797-01, and additional information is needed. Please provide the response on a signed and dated letter, in company letterhead, within 7 days from receipt of this letter, and make reference to mail control number 639969.

1. You included your point, calibration, flood and rod sources in your renewal. These sources are covered under 35.65 check, calibration, transmission and reference use.

Did you intend to list these sources on the license?

No I do not

2. Commit to the following statement:

We have developed and will implement and maintain written procedures for safe use of unsealed byproduct material that meet the requirements of 10 CFR 20.1101 and 10 CFR 20.1201.

Kuakini Medical Center hereby commits to the above requirements.

3. You mentioned that you are a contract RSO. Please provided the following:

a. 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 onsite time (hours per week or days per quarter, as appropriate for the program).

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

c. 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.

d. 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 presence.

I am the RSO at Kaiser Permanente on Oahu and Hilo Medical Center in Hilo, Hawaii.

I have been the RSO for Kuakini Medical Center since, I believe, 1997, first as an employee of the Queens Medical Center and since 2009 as a consultant.

I live less than 1/2 mile from the Medical Center and make regular visits to the site on an approximately weekly basis. Usually, I can be on-site in under an hour if needed.

I am onsite on a weekly basis at Kaiser (since 2014) currently as an employee and monthly at Hilo Medical Center as a consultant.

In addition I am readily accessible by cell phone and e-mail for all sites and spend significant time working at home in my duties as RSO.

Dr. Zachary Love, Authorized User under 35.100,200 and 300, serves as alternate RSO for Kuakini Medical Center. He and the chief technologist serve as in-house point of contact in my absence.

4. Kuakini Medical Center is a two story building. What is above or below the nuclear medicine department?

The department sits on the ground floor. There is nothing below the department but earth.

Offices for the Pathology department are above the Nuclear Medicine Department. There is no public access.

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 Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Thank you for your cooperatio