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Docket Number : 3039359  
License Number : 49-35724-01  
Licensee Name : Wyoming Heart and Vascular Center, LLC

**From:** [LDR\\_RSOservices](#)  
**To:** [R4 Licensing Action Submittals](#)  
**Cc:** [Mansour Khaddr](#)  
**Subject:** [External\_Sender] Amendment to License RML 49-35724-01  
**Date:** Tuesday, December 23, 2025 3:22:41 PM  
**Attachments:** image001.png  
image002.png  
2025-12-Update Procedures-Wyoming Heart and Vascular.pdf  
2025-11 RPP Wyoming Heart & Vascular Center.pdf

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Good Afternoon,

I have included an amendment to adopt the NRC model procedures for RML 49-35724-01. I have also attached the updated radiation protection plan for your review. Please let us know if there is anything else needed to complete this request.

Happy Holidays!

**Tom Lewis**  
MBA, BSRS, CNMT, NMTCB(RS),  
RSO  
Practice Associate, RSS  
Phone: +1 888-831-4880

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12-23-2025

U.S. NRC Region IV  
1600 E. Lamar Blvd.  
Arlington, TX 76011

**Re: Amendment to update the procedures for the NRC Radioactive Material License (RML) 49-35724-01**

As the radiation safety officer on the NRC Radioactive Material License **RML 49-35724-01**, I request our license be amended to update our procedures for our program.

1. We confirm that the Radiation Safety Officer Duties, and Responsibilities and Delegation as outlined in Appendix I of the U.S. Nuclear Regulatory Commission (NRC) guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.
2. We confirm that the General Topics for Safe Use of Radionuclides and Model Emergency Procedures as outlined in Appendix N of the U.S. NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.
3. We confirm that Model Procedures for Ordering and Receiving Packages as outlined in Appendix O of the U.S. NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.
4. We confirm that Model Procedures for Safely Opening Packages Containing Radioactive Material as outlined in Appendix P of the U.S. NRC guidance document NUREG-1556 Volume 9 Revision 3 will be implemented and followed.
5. We confirm that Model Procedures for Area as outlined in Appendix R of the U.S. NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.
6. We confirm that Model Procedures for Waste Disposal as outlined in Appendix W of the U.S. NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.
7. We confirm that Recordkeeping Requirements as outlined in Appendix X of the NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.
8. We confirm that Occupational Dose Monitoring Program Requirements as outlined in Appendix M of the NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.
9. We confirm that Safe Use as outlined in Appendix T of the NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.

Thank you for reviewing this request for an amendment to our Radioactive Materials License.

Enc: NRC Model Procedures

Sincerely,

*Thomas Lewis*

Radiation Safety Officer

12-23-2025

Date



## **RADIATION SAFETY PROGRAM NOVEMBER 2025**

**WYOMING HEART & VASCULAR CENTER, LLC**  
1204 HILLTOP DRIVE SUITE 105-106 | ROCK SPRINGS, WY 82901  
RADIATION SAFETY OFFICER | THOMAS LEWIS

# RADIATION SAFETY OFFICER (RSO)

## Will:

- Ensure and RAM is used safely.
- Ensure the on-going use of RAM are consistent with the ALARA philosophy.
- Identify program problems and work to institute solutions
- Wyoming Heart & Vascular Center, LLC will maintain RAM compliance records including:
  - Personnel dose records as applicable
  - Notice to Employees – posted conspicuously
  - Area surveys
  - NRC Agency Correspondence
  - Records of specific training
  - RAM receipt and wastes disposal records
  - Quarterly sealed source inventory
  - Semi annual leak test of sealed sources
  - Quarterly Audits
  - Quality control tests
  - Conduct and document an annual review of the radiation protection program.

## RECORDS

Records will be kept on a disc in the camera room at Wyoming Heart & Vascular Center, LLC. Required personnel will have access to this database and these files. These documents will be kept along with the written radiation safety program.

Records will be maintained as outlined in Appendix X of the NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed. Records of the provisions of the radiation safety program (including personnel radiation exposure monitoring records) will be maintained at Wyoming Heart & Vascular Center, LLC until the registration is terminated. Records of audits and other reviews of program content and implementation will be maintained at the Wyoming Heart & Vascular Center, LLC for 3 years after record was created. In the event that Wyoming Heart & Vascular Center, LLC ceases to perform radiology services, patient records, medical reports, will be placed in accessible dry storage or passed on to an appropriate successor.

## ALARA POLICY

The management and staff of Wyoming Heart & Vascular Center, LLC are committed to its radiation safety program and to maintaining individual and collective occupational radiation doses as low as reasonably achievable (ALARA). The radiation protection program will be reviewed on an annual basis. As a part of this review, radiation safety policies and procedures will be reviewed to ensure that the ALARA philosophy is implemented and incorporated. Such program reviews will be documented and maintained for inspection by the agency.

## RAM SECURITY:

RAM is located inside facility with controlled access.

## PATIENT PREGNANCY POLICY

Female patients ranging under the age of 50 will screened for possible pregnancy before any diagnostic radiographic procedures are performed.

If a patient is found to be pregnant, the stress test will be canceled. No known pregnant patients will receive radioactive materials under this license.

## PERSONNEL TRAINING POLICY

Wyoming Heart & Vascular Center, LLC commits to ensure personnel are trained as required pursuant to federal requirements.

**Certification and Education Requirements:** All radioactive materials users will maintain a professional license to practice from the state agency and will undergo training to include:

- Principles of ALARA, including personnel voluntary pregnancy declaration policy, pregnant patient policy, and other steps to keep radiation exposure to a minimum.

## WRITTEN SAFETY PROGRAM AVAILABILITY TO USERS

The Written Safety Program, dosimetry records (if applicable), and personnel training and operating policies are available kept on a disc in the camera room at Wyoming Heart & Vascular Center, LLC.

## PERSONNEL MONITORING PROGRAM

### External Dose Monitoring:

Wyoming Heart & Vascular Center, LLC will evaluate radiation exposure levels for employees occupationally exposed. Any personnel that may receive an occupational dose greater than 10% of their annual limit of radiation, or as otherwise required by 10 CFR 20, will wear a monitoring device dosimeter. Personnel monitoring devices (optimally stimulate luminescence (OSL) and thermoluminescent dosimeters (TLD) are available to individuals to measure radiation exposure from radiation. The dosimeter device is to be worn at the collar or chest, outside of any lead apron. Ring badges are to be worn on the dominant hand with the clip facing towards the palm. The dosimeters will be collected and returned at least on a quarterly basis to be analyzed. Records will be stored on a disc in the camera room and can be provided to any participants upon request. Annual form 5 reports will be provided to individuals if occupational dose exceeds 1mSv (100 mrem) TEDE or 1 mSv (100 mrem) to any individual organ or tissue.

Staff will always wear their personal dosimeter when working in the radiation area.

Staff will keep their personal radiation exposure as low as possible. They will be aware of their surroundings, the distance from the radiation source, and limit how long they stay in the radiation area. No one may enter or remain in a radiation area unless it is necessary.

When not in use, the radiation badges will be stored in the doctor's office or technical staff office along with the control badges.

Deceptive Exposure of a radiation monitoring device is strictly prohibited and consequences for such actions will be determined by management of Wyoming Heart & Vascular Center, LLC.

Any employee that receives occupational radiation exposure at another employer will furnish their dosimetry records every quarter. Wyoming Heart & Vascular Center, LLC will reduce the dose that an individual may be allowed to receive in the current year by the amount of prior or current occupational dose received while employed by any other person.

Should change occur in the program, Wyoming Heart & Vascular Center, LLC would re-evaluate the personnel monitoring and ensure all occupationally exposed employees remain in compliance with the limits and action levels below:

Annual Occupational Dose Limits For Adults (Minors Occupational limits are 10% of the Adult Dose Limits)

## Annual Occupational Dose Limits

5rems (5,000mrem) total effective dose, whole body
15rem (15,000mrem) eye dose equivalent, lens of eye
50rems (50,000mrem) shallow dose equivalent, skin or extremity

### Action Levels:

Specific procedures for responding to any occupational radiation dose that exceeds certain action levels in the following table have been established:

	ACTION LEVELS (millirem per monitoring period)	Level I	Level II
1	Whole body: head trunk, or gonads	125	375
2	Lens of the eye	375	1125
3	Extremities: elbow, arm below the elbow, foot, knee, leg below the knee, or skin	1250	3750
4	Fetal Dose of a Declared Pregnant Worker	30	40

### Action Procedures:

When Level I doses are exceeded, the Radiation Safety Officer, shall review the past dose history of the individual. The individual will be requested to review their radiation safety procedures and work habits in an effort to maintain all doses as low as reasonably achievable.

When Level II doses are exceeded, a direct investigation of the situation, including an interview with the person involved will be conducted. A written investigation report shall be made, including dose trends over the past one year (as available) for that person. The person involved will be provided with a copy of the report for review and signature. Conclusions drawn from the investigation will provide a basis for confirming or modifying the dose and for establishing any corrective actions to be taken.

## VOLUNTARY DECLARED PREGNANCY DOSE POLICY

### Introduction:

The National Council on Radiation Protection and Measurements (NCRP) has recommended a radiation dose of 500 millirem (5 mSv) for the embryo/fetus during the entire gestation period. This regulation is hereby adopted by Wyoming Heart & Vascular Center, LLC.

The purpose of this policy is to specify the additional protective measures provided for the more radiosensitive embryo/fetus. Procedures for providing these extra safety measures are also included within this policy.

### Specifications:

Ensuring an additional level of radiation protection for the embryo/fetus of radiation employees requires close cooperation with supervision. A radiation employee should contact the Radiation Safety Officer as early as possible to obtain the relevant radiation safety information. Early contact will maximize the benefits provided by the safety information.

Fetal dose safety conferences will be scheduled with each radiation employee who declares their actual, suspected or planned pregnancy. This voluntary declaration must be in writing to the Radiation Safety Officer. These safety conferences are also offered to any other employee upon request.

Safety aspects of the employee's work will be discussed during the conference. The employee will be given a copy of this policy. An opportunity to clarify any questions will be provided. The potential for occupational radiation exposure will be discussed.

### **Confidentiality During Pregnancy:**

It is realized that individual radiation employees may choose to maintain their pregnancy status as personally confidential for a time. Wyoming Heart & Vascular Center, LLC has no responsibility for providing specific fetal radiation dose precautions until a radiation employee openly declares their pregnancy status in writing to the Radiation Safety Officer.

### **Declared Pregnancy:**

When an employee wishes Wyoming Heart & Vascular Center, LLC to be involved in protecting their fetus under the 500 millirem dose guideline, they must declare their pregnancy in writing to the Radiation Safety Officer. The safety conference will then be scheduled. During the conference, the employee and the Radiation Safety Officer will sign a statement confirming the date of the conference and that the radiation safety information was discussed.

### **Fetal Dose Control Procedures:**

Control of the fetal dose will be carried out with full cooperation of the employee and without economic penalty or loss of job opportunity. Wyoming Heart & Vascular Center, LLC's responsibility to protect the fetus under the 500 millirem dose guideline begins only when the employee declares their pregnancy in writing.

It is recommended that the occupational radiation dose of a radiation employee who has declared their pregnancy not exceed 50 millirem per month during the gestation period. When the dose does exceed 50 millirem in a month since declaration, specific personnel policies may apply.

In conjunction with the 500 millirem fetal dose limit, the As Low As Reasonably Achievable (ALARA) radiation protection philosophy will be applied to maintain any dose to as low as practicable levels. All employees have the individual responsibility to adhere to established safety policies and procedures.

## **DOSE LIMITS TO INDIVIDUAL MEMBERS OF THE PUBLIC**

The use of the radioactive materials should not cause any individual member of the public to receive greater than 100 millirem per year. See member of public area radiation survey to demonstrate compliance.

## **AREA REQUIREMENTS:**

Wyoming Heart & Vascular Center, LLC commits to ensure no radiation levels exist in any area surrounding the restricted rooms that could result in a dose to any individual present in excess of the dose limits for members of the public.

See member of public area radiation survey to demonstrate compliance.

## **QUALITY CONTROL**

Digital Image Acquisitions Systems: Follow the QA & QC protocols established by the manufacturer.

## IMAGE RECEPTORS

Image receptors will produce images at radiation levels to the patient consistent with state rules and generally accepted guidelines of good practice. Wyoming Heart & Vascular Center, LLC will strive to maintain patient doses ALARA while maintaining good image quality.

## PROTECTIVE DEVICES

Lead aprons and other protective devices shall be properly used and stored to protect their integrity. Hang on appropriate hangers or lay flat. Do not fold.

Protective devices will be inspected annually. A visual and touch inspection will be performed to detect suspect areas. Radiographs to check the integrity of suspect areas will be taken.

Items with significant holes or tears will be removed from service and replaced.

## POSTING

“Radiation Area” sign shall be posted for an area in which radiation levels could result in an individual receiving a dose equivalent in excess of 0.005 rem (0.05 mSv) in one hour at 30 centimeters from the radiation source or from any surface that the radiation penetrates. Each radiation area will be posted with a conspicuous sign or signs bearing the radiation symbol and the words: CAUTION RADIATION AREA

The licensee shall post each area or room in which there is used or stored an amount of licensed radioactive material exceeding 10 times the quantity of such material specified in Appendix C to 10 CFR §§ 20.1001 - 20.2401 with a conspicuous sign or signs bearing the radiation symbol and the words:

CAUTION RADIOACTIVE MATERIAL(S) or the words: DANGER RADIOACTIVE MATERIAL(S)

In addition to the radiation area postings required, a Notice to Employees (NRC Form 3), will be posted at Wyoming Heart & Vascular Center, LLC.

## RSO DUTIES AND RESPONSIBILITIES

The Radiation Safety Officer Duties, and Responsibilities and Delegation as outlined in Appendix I of the U.S. Nuclear Regulatory Commission (NRC) guidance document NUREG-1556- Volume 9 Revision 3 will be implemented and followed.

## EMERGENCY PROCEDURES

The General Topics for Safe Use of Radionuclides and Model Emergency Procedures as outlined in Appendix N of the U.S. NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.

## ORDERING AND RECEIVING PACKAGES

The Model Procedures for Ordering and Receiving Packages as outlined in Appendix O of the U.S. NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.

## SAFELY OPENING PACKAGES CONTAINING RADIOACTIVE MATERIAL

The Model Procedures for Safely Opening Packages Containing Radioactive Material as outlined in Appendix P of the U.S. NRC guidance document NUREG-1556 Volume 9 Revision 3 will be implemented and followed.

## SAFE USE

The Model Procedures for Safe Use of Radioactive Materials as outlined in Appendix T of the U.S. NRC guidance document NUREG-1556 Volume 9 Revision 3 will be implemented and followed.

## AREA SURVEYS

The Model Procedures for Area Survey as outlined in Appendix R of the U.S. NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.

## DECAY-IN-STORAGE

The Model Procedures for Waste Disposal by Decay-in-Storage, Generator Return, Licensed Material Return and Disposal of Liquids into Sanitary Sewer as outlined in Appendix W of the U.S. NRC guidance document NUREG-1556, Volume 9 Revision 3 will be implemented and followed.

## REPORTS OF RADIATION EXCEEDING THE LIMITS

- (a) Reportable events. In addition to the notification required by § 20.2202, each licensee shall submit a written report within 30 days after learning of any of the following occurrences:
- (1) Any incident for which notification is required by § 20.2202; or
  - (2) Doses in excess of any of the following:
    - (i) The occupational dose limits for adults in § 20.1201; or
    - (ii) The occupational dose limits for a minor in § 20.1207; or
    - (iii) The limits for an embryo/fetus of a declared pregnant woman in § 20.1208; or
    - (iv) The limits for an individual member of the public in § 20.1301; or
    - (v) Any applicable limit in the license; or
    - (vi) The ALARA constraints for air emissions established under § 20.1101(d); or
  - (3) Levels of radiation or concentrations of radioactive material in—
    - (i) A restricted area in excess of any applicable limit in the license; or
    - (ii) An unrestricted area in excess of 10 times any applicable limit set forth in this part or in the license (whether or not involving exposure of any individual in excess of the limits in § 20.1301); or
  - (4) For licensees subject to the provisions of EPA's generally applicable environmental radiation standards in 40 CFR part 190, levels of radiation or releases of radioactive material in excess of those standards, or of license conditions related to those standards.
- (b) Contents of reports. (1) Each report required by paragraph (a) of this section must describe the extent of exposure of individuals to radiation and radioactive material, including, as appropriate:
- (i) Estimates of each individual's dose; and
  - (ii) The levels of radiation and concentrations of radioactive material involved; and
  - (iii) The cause of the elevated exposures, dose rates, or concentrations; and
  - (iv) Corrective steps taken or planned to ensure against a recurrence, including the schedule for achieving conformance with applicable limits, ALARA constraints, generally applicable environmental standards, and associated license conditions.
- (2) Each report filed pursuant to paragraph (a) of this section must include for each occupationally overexposed<sup>1</sup> individual: the name, Social Security account number, and date of birth. The report must be

prepared so that this information is stated in a separate and detachable part of the report and must be clearly labeled "Privacy Act Information: Not for Public Disclosure."

(c) For holders of an operating license or a combined license for a nuclear power plant, the occurrences included in paragraph (a) of this section must be reported in accordance with the procedures described in §§ 50.73(b), (c), (d), (e), and (g) of this chapter, and must include the information required by paragraph (b) of this section. Occurrences reported in accordance with § 50.73 of this chapter need not be reported by a duplicate report under paragraph (a) of this section.

(d) All licensees, other than those holding an operating license or a combined license for a nuclear power plant, who make reports under paragraph (a) of this section shall submit the report in writing either by mail addressed to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555–0001; by hand delivery to the NRC's offices at 11555 Rockville Pike, Rockville, Maryland; or, where practicable, by electronic submission, for example, Electronic Information Exchange, or CD–ROM. Electronic submissions must be made in a manner that enables the NRC to receive, read, authenticate, distribute, and archive the submission, and process and retrieve it a single page at a time. Detailed guidance on making electronic submissions can be obtained by visiting the NRC's Web site at <http://www.nrc.gov/site-help/e-submittals.html>; by e-mail to [MSHD.Resource@nrc.gov](mailto:MSHD.Resource@nrc.gov); or by writing the Office of the Chief Information Officer, U.S. Nuclear Regulatory Commission, Washington, DC 20555–0001. A copy should be sent to the appropriate NRC Regional Office listed in appendix D to this part.

## REVIEW OF SAFETY PROGRAM

These procedures have been developed to ensure safe radiological working conditions. Everyone must adhere to these procedures. Prior approval must be obtained for ANY deviation from these procedures.

The licensee/RSO shall annually review the radiation protection program content and implementation. These procedures have been made available to each individual who uses, handles, or administers radioactive materials.

RSO/ \_\_\_\_\_  
User      Signature/Date

RSO/ \_\_\_\_\_  
User      Signature/Date