



Integral Nuclear Associates, LLC

March 1, 2002

Sheryl Villar  
Regional Administrator  
Division of Nuclear Material Safety  
ATTN: Reciprocity Request  
Nuclear Materials Safety Branch  
U.S. Nuclear Regulatory Commission, Region I  
475 Allendale Raod  
King of Prussia, PA 19406-1415

**Re: Reciprocity Request Under New York License Number 5058**

Dear Ms. Villar,

We wish to establish reciprocity with the Nuclear Regulatory Commission under New York State Department of Health Radioactive Materials License Number 5058. Please see the attached license copy.

Our mobile PET facility will be used at 2701 Blair Mill Road, Willow Grove, PA 19090. PET agent, F-18, will be ordered under Abington Memorial Hospital's license number PA-0055. F-18 will be ordered and received by Abington Memorial Hospital.

We will be servicing this location every Wednesday beginning March 6, 2002.

Attached is a check for \$1400 for our annual reciprocity fee.

If you have any further questions or need any additional information, please do not hesitate to notify me or Janice Harkins of my staff, at (800) 394-2620, Ext. 208.

Sincerely,



Sandra Atkinson  
Vice President of Administration

Attachments

**NRC FORM 241**  
(7-1999)

**U.S. NUCLEAR REGULATORY COMMISSION**

**REPORT OF PROPOSED ACTIVITIES IN NON-AGREEMENT STATES, AREAS OF EXCLUSIVE FEDERAL JURISDICTION, OR OFFSHORE WATERS**

*(Please read the instructions before completing this form)*

**APPROVED BY OMB: NO. 3150-0013**      **EXPIRES: 07/31/2002**  
 Estimated burden per response to comply with this mandatory collection request: 15 minutes. This notification is required so that NRC may schedule inspection of the activities to ensure that they are conducted in accordance with requirements for protection of the public health and safety. Send comments regarding burden estimate to the Records Management Branch (7-6 EB), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjs1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NE0B-10202, (3150-0013), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. NAME OF LICENSEE (Person or firm proposing to conduct the activities described below)  
**Integral PET Associates, LLC**

2. TYPE OF REPORT  
 INITIAL     REVISION     CLARIFICATION

3. ADDRESS OF LICENSEE (Mailing address or other location where licensee may be located)  
**Paoli Executive Green II  
 43 Leopard Road, Suite 200  
 Paoli, PA 19301**

4. LICENSEE CONTACT AND TITLE  
**Wendy Rowan  
 Vice President of Operations**

5. TELEPHONE NUMBER (Include Area Code)  
**(610) 993-1640 x 203**

6. FACSIMILE NUMBER (Include Area Code)  
**(610) 993-1651**

7. ACTIVITIES TO BE CONDUCTED UNDER THE GENERAL LICENSE GIVEN IN 10 CFR 150.20

WELL LOGGING     LEAK TESTING AND/OR CALIBRATIONS     TELETHERAPY/IRRADIATOR SERVICE

PORTABLE GAUGES     OTHER (Specify) ⇒ **Mobile PET Service (sealed sources) only**

RADIOGRAPHY ⇒ REGISTERED AS USER OF PACKAGING (CERTIFICATES OF COMPLIANCE NUMBERS)

8. CLIENT NAME, ADDRESS, CITY/COUNTY, STATE, ZIP CODE  
**Abington Memorial Hospital  
 2701 Blair Mill Road  
 Willow Grove, PA 19090**

9. ACTUAL PHYSICAL ADDRESS OF WORK LOCATION (Street and Number or other location. Give as complete an address or directions as possible.)  
**RV trailer located directly behind  
 Abington Memorial Hospital  
 2701 Blair Mill Road  
 Willow Grove, PA 19090**

10. CLIENT TELEPHONE NUMBER (Include Area Code)  
**(215) 481-2000**

11. WORK LOCATION TELEPHONE NUMBER (Include Area Code)  
**(215) 481-2827**

12. DATES SCHEDULED

FROM	TO	13. NUMBER OF WORK DAYS	14. ADD	15. DELETE	16. LOCATION REFERENCE NUMBER
<b>3-6-02</b>	<b>12-18-02</b>	<b>42</b> (Every Wednesday)			<b>000452</b>

17. LIST RADIOACTIVE MATERIAL, WHICH WILL BE POSSESSED, USED, INSTALLED, SERVICED, OR TESTED (Include description of type and quantity of radioactive material, sealed sources, or devices to be used.)

1) Cs-137 vial Isotope Products Cat. No. SRV-137-250U (Dose Calibrator QC)      4) Cs-137 Model HEG-0096 ADAC/Isotope Products (PET transmission source)

2) Cs-137 rod Isotope Products Cat. No. SGF-0211 (Well Counter QC)      5) Na-22 Model GF-0227 ADAC/Isotope Prod. (Camera QC)

3) Co-57 vial Isotope Products Cat. No. SRV-057-SM (Dose Calibrator QC)

18. AGREEMENT STATE SPECIFIC LICENSE WHICH AUTHORIZES THE UNDERSIGNED TO CONDUCT ACTIVITIES WHICH ARE THE SAME, EXCEPT FOR LOCATION OF USE, AS SPECIFIED IN ITEM 9 ABOVE. (Four copies of the specific license must accompany the initial NRC Form 241.)

LICENSE NUMBER: **5058**    STATE: **NY**    EXPIRATION DATE: **2-29-2012**

19. CERTIFICATION (MUST BE COMPLETED BY APPLICANT)

I, THE UNDERSIGNED, HEREBY CERTIFY THAT:

- All information in this report is true and complete.
- I have read and understand the provision of the general license 10 CFR 150.20 reprinted on the instructions of this form; and I understand that I am required to comply with these provisions as to all byproduct, source, or special nuclear material which I possess and use in non-Agreement States or offshore waters under the general license for which this report is filed with the U.S. Nuclear Regulatory Commission.
- I understand that activities, including storage, conducted in non-Agreement States under general license 10 CFR 150.20 are limited to a total of 180 days in calendar year. With the exception of work conducted in off-shore waters, which is authorized for an unlimited period of time in the calendar year.
- I understand that I may be inspected by NRC at the above listed work site locations and at the Licensee home office address for activities performed in non-Agreement States or offshore waters.
- I understand that conduct of any activities not described above, including conduct of activities on dates or locations different from those described above or without NRC authorization, may subject me to enforcement action, including civil or criminal penalties.

**Sandra M. Atkinson**

CERTIFYING OFFICER - RSO or Management Representative (Name and Title)      SIGNATURE      DATE

**VP Administration**      **Sandra M. Atkinson**      **3-1-02**

WARNING: False statements in this certificate may be subject to civil and/or criminal penalties. NRC regulations require that submissions to the NRC be complete and accurate in all material respects. 18 U.S.C. Section 1001 makes it a criminal offense to make a willfully false statement or representation to any department or agency of the United States as to any matter within its jurisdiction.

FOR NRC USE ONLY    REVIEWING OFFICIAL (Typed/Printed Name and Title)    SIGNATURE    DATE    TOTAL USAGE - DAYS TO DATE

**Pamela J. Henderson**    **Pamela J. Henderson**    **3/1/02**    **43**

See additional dtd 3/1/02 (2)

Saklik office

Main office

(2) 3/1/02



Integral Nuclear Associates, LLC

March 1, 2002

Sheryl Villar  
 Regional Administrator  
 Division of Nuclear Material Safety  
 ATTN: Reciprocity Request  
 Nuclear Materials Safety Branch  
 U.S. Nuclear Regulatory Commission, Region I  
 475 Allendale Road  
 King of Prussia, PA 19406-1415

**Re: Addendum to Reciprocity Request Under New York License Number 5058**

Dear Ms. Villar,

We would like to make an addendum to Item 12 to the Form 241 dated March 1, 2002.

Reciprocity is requested for the following dates:

March 1, 2002	June 5, 2002	September 11, 2002
March 6, 2002	June 12, 2002	September 18, 2002
March 13, 2002	June 19, 2002	September 25, 2002
March 20, 2002	June 26, 2002	October 2, 2002
March 27, 2002	July 3, 2002	October 9, 2002
April 3, 2002	July 10, 2002	October 16, 2002
April 10, 2002	July 17, 2002	October 23, 2002
April 17, 2002	July 24, 2002	October 30, 2002
April 24, 2002	July 31, 2002	November 6, 2002
May 1, 2002	August 7, 2002	November 13, 2002
May 8, 2002	August 14, 2002	November 20, 2002
May 15, 2002	August 21, 2002	November 27, 2002
May 22, 2002	August 28, 2002	December 4, 2002
May 29, 2002	September 4, 2002	December 11, 2002
		December 18, 2002

This is a total of 43 days.

If you have any further questions or need any additional information, please do not hesitate to notify me or Janice Harkins of my staff, at (800) 394-2620, Ext. 208.

Sincerely,

Sandra Atkinson  
 Vice President of Administration

**COPY**

**NEW YORK STATE DEPARTMENT OF HEALTH  
RADIOACTIVE MATERIALS LICENSE**

Pursuant to the Public Health Law and Part 16 of the New York State Sanitary Code, and in reliance on statements and representations heretofore made by the licensee designated below, a license is hereby issued authorizing radioactive material(s) for the purpose(s), and at the place(s) designated below. The license is subject to all applicable rules, regulations, and orders now or hereafter in effect of all appropriate regulatory agencies and to any conditions specified below.

- |  |  |
|--|--|
| 1. Name<br><br>Integral PET Associates, LLC  | 3. License Number 5058   |
| 2. Address<br><br>Paoli Executive Green<br>43 Leopard Road, Suite 200<br>Paoli, Pennsylvania 19301<br><br>Attention: Brian K. McCandless, M.D.<br>Radiation Safety Officer | 4. a. Effective Date<br><br><u>February 26, 2002</u><br><br>b. Expiration Date<br><br><u>February 29, 2012</u> |
|  | 5. Reference Number<br>DH No. 02-52  |
- 
- |   |  |   |
|---|--|---|
| 6. Radioactive Materials<br>(element & mass no.)                  | 7. Chemical and/or<br>Physical Form                                      | 8. Maximum quantity<br>licensee may possess<br>at one time  |
| A. Any radioactive material<br>with Atomic Number less<br>than 84 | A. Sealed reference sources<br>as described in<br>10 NYCRR 16.123(e)(4)  | A. No source to exceed 15<br>millicuries. No vehicle<br>or use location to exceed<br>100 millicuries. |
| B. Cesium 137   | B. Sealed sources<br>(Isotope Product<br>Laboratories Model<br>HEG-0096) | B. No source to exceed<br>6 millicuries. No<br>vehicle or use location to<br>exceed 35 millicuries.   |
9. Authorized use (No use authorized by this license at the address listed in Item 2).
- A. For possession incident to transportation to authorized client facilities within New York State (excluding New York City and areas under exclusive federal jurisdiction), and use as calibration and reference sources, and as may be necessary for leak-testing.

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**NEW YORK STATE DEPARTMENT OF HEALTH  
RADIOACTIVE MATERIALS LICENSE**

**CONDITIONS**

License No. 5058

9. B. For possession incident to transportation to authorized client facilities within New York State (excluding New York City and areas under exclusive federal jurisdiction), and use as calibration and reference sources, for patient attenuation correction, and as may be necessary for leak-testing.
10. A. Radioactive material listed in Item 6 shall only be used under the supervision of physicians listed as authorized users at client facilities serviced by Integral PET Associates, LLC
- B. Radioactive material listed in Item 6 shall be used by Brian K. McCandless, M.D., to fulfill the responsibilities of the Radiation Safety Officer.
11. Except as specifically provided otherwise by this license, the licensee shall possess and use licensed material described in Items 6, 7, and 8 of this license, in accordance with statements, representations, and procedures contained in the documents (including any enclosures) listed below:
- A. Application for New York State Department of Health Radioactive Materials License dated January 25, 2002, signed by Wendy Rowan.
- B. Letter dated February 20, 2002, signed by Wendy Rowan.
- The New York State Department of Health's regulations shall govern the licensee's statements in applications or letters unless the statements are more restrictive than the regulations.
12. A. Radioactive materials shall only be used at client facilities specifically authorized by the New York State Department of Health for service by Integral PET Associates, LLC.
- B. Radioactive materials may be used at authorized client facilities within New York State, excluding Bronx, Kings, Queens, New York, and Richmond counties, and facilities under exclusive federal jurisdiction. Before radioactive material can be used at client facilities in another State, authorization shall be obtained from the State if it is an Agreement State, or from the NRC for non-Agreement States, by either filing for reciprocity or applying for a specific license. For facilities under exclusive federal jurisdiction, authorization shall be obtained by either filing a NRC Form-241 in accordance with 10 CFR 150.20(b), "Recognition of Agreement State Licensees", or by applying for a specific NRC license.
13. A. Radioactive material shall be stored in a locked facility in the original shipping container, or a container providing equivalent radiation protection. Such a facility may be a cabinet, a safe, or a room, providing the facility is locked at all times when no activities are in progress relating to the use of the radioactive material. This includes periods of brief absence of personnel from a nuclear medicine department, laboratory, etc., where radioactive materials are used or stored.

**NEW YORK STATE DEPARTMENT OF HEALTH  
RADIOACTIVE MATERIALS LICENSE**

**CONDITIONS**

License No. 5058

13. B. Radioactive materials shall not be stored in the same facilities with materials which might substantially increase the fire or explosion hazard of the storage space and its radioactive contents.
- C. Under no circumstances shall radioactive material authorized by this license be transferred to the custody of any person or firm other than the licensee, or be used or stored by another person or firm or its employees, unless that person or firm possesses a valid license to possess and use such radioactive material.
- D. Overnight storage shall be in accordance with statements referenced in Condition 11 of the license, providing that such storage may not be in a residence, or in an attached garage except within a vehicle. Any vehicle used for storage shall be driven only for purposes associated with use or transport of the contained radioactive material, by a person trained in radiation safety procedures, and no passengers shall be carried unless they are also involved in work under this license.
14. A. Transportation of licensed radioactive material shall be subject to all regulations of the U.S. Department of Transportation and other agencies of the United States having jurisdiction insofar as such regulations relate to the packaging of radioactive material, marking and labeling of the packages, loading and storage of packages, monitoring requirements, accident reporting, and shipping papers.
- B. Transportation of low level radioactive waste shall be in accordance with the regulations of the New York State Department of Environmental Conservation as contained in 6 NYCRR Part 381.
15. The licensee shall have available an appropriate survey meter which shall be maintained operational and shall be calibrated before initial use and at subsequent intervals not exceeding twelve months by persons specifically authorized by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services. Records of all calibrations shall be kept a minimum of five years.
16. The licensee shall follow the camera manufacturer's recommendations for radiation safety and quality assurance.
17. The licensee shall conduct a physical inventory every three months to account for all sealed sources received and possessed under the license. The records of the inventories shall be maintained for five years from the date of the inventory for inspection by the Department, and shall include the quantities and kinds of licensed material, location of the sealed sources, and the date of the inventory.
18. Sealed sources containing radioactive material shall not be opened or removed from their respective source holders by the licensee.

**NEW YORK STATE DEPARTMENT OF HEALTH  
RADIOACTIVE MATERIALS LICENSE**

**CONDITIONS**

License No. 5058

19. Leak tests of sealed sources shall be performed in accordance with Section 16.10 (a) (4), New York State Sanitary Code (10 NYCRR 16). Off-site analysis of leak test samples shall be performed by persons specifically authorized by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services. On-site analysis of leak test samples shall be in accordance with procedures approved by the Department.
20. In the event that a theft, loss, or other serious incident does occur, the Department shall be notified immediately by telephone and subsequent information acquired by the licensee shall be reported as it is received.
21. The licensee is authorized to hold radioactive material with a physical half-life of less than 65 days for decay-in-storage before disposal in ordinary trash, provided:
- A. Affected radioactive waste shall be held for decay a minimum of ten half-lives.
  - B. Prior to disposal as normal waste, radioactive waste shall be surveyed to determine that its radioactivity cannot be distinguished from background. All radiation labels will be removed or obliterated.
22. A. The licensee shall not release any licensed radioactive materials into the environment except as allowed by the New York State Department of Environmental Conservation.
- B. Before use or disposal of any licensed radioactive material in a manner that could result in discharge or release to the environment, the licensee shall obtain from the New York State Department of Environmental Conservation either:
- i) A valid permit, or
  - ii) A letter stating that no permit is required.
- C. The licensee shall maintain the letter or valid permit required in paragraph B of this condition on file for the duration of the license and make such letter or permit available for inspection by the Department upon request.
23. The licensee shall submit complete decontamination procedures to the Department for approval ninety (90) days prior to the termination of operations involving radioactive materials in any restricted area.
24. Plans of facilities which the licensee intends to dedicate to operations involving the use of radioactive material shall be submitted to the Department for review and approval prior to any such use.

**NEW YORK STATE DEPARTMENT OF HEALTH  
RADIOACTIVE MATERIALS LICENSE**

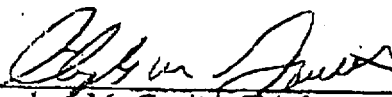
**CONDITIONS**

License No. 5058

25. The licensee shall maintain records of information important to safe and effective decommissioning at Integral PET Associates, LLC, Paoli Executive Green, 43 Leopard Road, Suite 200, Paoli, Pennsylvania, and at other locations as the licensee chooses. The records shall be maintained until this license is terminated by the Department and shall include:
- A. Records of spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment, or site;
  - B. As-built drawings and modifications of structures and equipment in restricted areas where radioactive materials are used and/or stored, and locations of possible inaccessible contamination such as buried pipes which may be subject to contamination;
  - C. Records of the cost estimate performed for the decommissioning funding plan or the amount certified for decommissioning, and records of the funding method used for assuring funds if either a funding plan or certification is used.
26. Initially and annually thereafter, the Radiation Safety Officer, an authorized user named on this radioactive materials license, or an authorized user named on the client facility's radioactive materials license, shall evaluate the technologist, equipment and procedures at each client facility. In addition, an evaluation by an authorized user shall be conducted immediately after any change in imaging equipment or technologist at (at least) one client facility. All evaluations must be documented in writing and copies kept at the licensee's address.
27. A. Records of authorized transport under this license and records of the radiation safety program, including all training, personnel monitoring, survey, inventory, quality control, calibration, and radiation safety program evaluation records shall be available for inspection by the department.
- B. Records to be maintained in the licensee's vehicle shall include a shipping manifest for the radioactive materials present, vehicle contamination and radiation field survey records for the current month, most recent sealed source inventory and leak test results for all sources present, emergency instructions in case of vehicular accident, radiation safety procedures, a copy of the current radioactive materials license, current survey meter, dose calibrator, imaging equipment, and auxiliary radiation detection and measuring instrument calibration records, and authorization from the Radiation Safety Officer for the individual(s) present to handle and use radioactive material.

FOR THE NEW YORK STATE DEPARTMENT OF HEALTH

Date: FEB 26 2002  
SG/CAC

By   
Stephen M. Gavitt, Chief  
Radioactive Materials Section  
Bureau of Environmental Radiation Protection

cc: Wendy Rowan, Vice President for Operations





COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF RADIATION PROTECTION

Page 1 of 1 Pages

License No. PA-R0019

RADIOACTIVE MATERIALS LICENSE  
RECIPROCITY

Expiration Date:  
February 28, 2003

Ms. Wendy Rowan  
Integral Nuclear Associates, L.L.C.  
Executive Green  
43 Leopard Road, Suite 200  
Paoli, PA 19301

Dear Ms. Rowan:

This refers to your letter of February 27, 2002, requesting a grant of reciprocity to conduct licensed activities in Pennsylvania under New York Radioactive Material License Number 5058.

The Department hereby grants reciprocity to Integral PET Associates, L.L.C. under 25 PA Code Section 217.203, Section 217.203(a)(1) notwithstanding, to use radioactive material as described in New York License Number 5058.

The Department must be notified in advance as required under 25 PA Code Section 217.203(a)(2) whenever Integral Associates, L.L.C. intends to enter Pennsylvania to conduct licensed activities.

Reciprocity is a General License authorizing activities within Pennsylvania for up to 180 days per calendar year. The General License remains in force until the expiration date noted above, while the referenced New York License (current expiration date February 29, 2012) is valid or until revoked by the Department.

Please have a copy of this document and the referenced New York license present while conducting activities within Pennsylvania.

For the Pennsylvania Department  
of Environmental Protection

Louis Ray Urciuolo  
Bureau of Radiation Protection  
P. O. Box 8469  
Harrisburg, PA 17105-8469

Date: February 28, 2002