

NRC FORM 241 (7-1999)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB: NO. 3150-0013		EXPIRES: 07/31/2002	
REPORT OF PROPOSED ACTIVITIES IN NON-AGREEMENT STATES, AREAS OF EXCLUSIVE FEDERAL JURISDICTION, OR OFFSHORE WATERS <i>(Please read the instructions before completing this form)</i>							
1. NAME OF LICENSEE <i>(Person or firm proposing to conduct the activities described below)</i> <i>Integral PET Associates, LLC</i>				2. TYPE OF REPORT <input type="checkbox"/> INITIAL <input checked="" type="checkbox"/> REVISION <input type="checkbox"/> CLARIFICATION			
3. ADDRESS OF LICENSEE <i>(Mailing address or other location where licensee may be located)</i> <i>Paoli Executive Green II 43 Leopard Road, Suite 200 Paoli, PA 19301</i>				4. LICENSEE CONTACT AND TITLE <i>Wendy Rowan Vice President of Operations</i>			
				5. TELEPHONE NUMBER <i>(Include Area Code)</i> <i>(610) 993-1640 x203</i>		6. FACSIMILE NUMBER <i>(Include Area Code)</i> <i>(610) 993-1651</i>	
7. ACTIVITIES TO BE CONDUCTED UNDER THE GENERAL LICENSE GIVEN IN 10 CFR 150.20 <input type="checkbox"/> WELL LOGGING <input type="checkbox"/> LEAK TESTING AND/OR CALIBRATIONS <input type="checkbox"/> THERAPY/IRRADIATOR SERVICE <input type="checkbox"/> PORTABLE GAUGES <input checked="" type="checkbox"/> OTHER (Specify) ⇒ <i>Mobile PET Service (sealed sources only)</i> <input type="checkbox"/> RADIOGRAPHY ⇒ REGISTERED AS USER OF PACKAGING (CERTIFICATES OF COMPLIANCE NUMBERS)							
8. CLIENT NAME, ADDRESS, CITY/COUNTY, STATE, ZIP CODE <i>Phoenixville Hospital 140 Nutt Road P.O. Box 809 Phoenixville, PA 19460-0809</i>				9. ACTUAL PHYSICAL ADDRESS OF WORK LOCATION <i>(Street and Number or other location. Give as complete an address or directions as possible.)</i> <i>RV behind Phoenixville Hospital 140 Nutt Road Phoenixville, PA 19460-0809</i>			
				10. CLIENT TELEPHONE NUMBER <i>(Include Area Code)</i> <i>(610) 983-1125</i>		11. WORK LOCATION TELEPHONE NUMBER <i>(Include Area Code)</i> _____	
12. DATES SCHEDULED FROM <i>7-30-02</i> TO <i>7-30-02</i>		13. NUMBER OF WORK DAYS <i>1</i>	14. ADD <i>1</i>	15. DELETE	16. LOCATION REFERENCE NUMBER NUMBER TO BE ASSIGNED BY NRC <i>000890</i>		
LIST ADDITIONAL WORK SITES ON SEPARATE SHEET(S) TO INCLUDE ALL INFORMATION CONTAINED IN ITEMS 9-16 ABOVE.							
17. LIST RADIOACTIVE MATERIAL, WHICH WILL BE POSSESSED, USED, INSTALLED, SERVICED, OR TESTED <i>(Include description of type and quantity of radioactive material, sealed sources, or devices to be used.)</i> <i>1) Cs-137 vial Isotope Products Cat. No. SRV-137-250U (Dose Calibrator OC)</i> <i>2) Cs-137 rod Isotope Products Cat. No. S&F-0211 (Well Counter OC)</i> <i>3) Co-57 vial Isotope Products Cat. No. SRV-057-SM (Dose Calibrator OC)</i> <i>4) Cs-137 Model HEG-0096 ADAC/Isotope Products (PET Transmission Source)</i> <i>5) Na-22 Model GF-0237 ADAC/Isotope Prod. (Camera OC)</i>							
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 <i>SOSP</i>	STATE <i>NY</i>	EXPIRATION DATE <i>2-29-2012</i>	
19. CERTIFICATION (MUST BE COMPLETED BY APPLICANT) I, THE UNDERSIGNED, HEREBY CERTIFY THAT:							
a. All information in this report is true and complete. b. 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. c. 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. d. 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. e. 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.							
CERTIFYING OFFICER - RSO or Management Representative (Name and Title) <i>Wendy Rowan, Vice President of Operations</i>				SIGNATURE <i>Wendy A. Rowan</i>		DATE <i>7/22/02</i>	
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) <i>J. A. Joubert Sr HP</i>		SIGNATURE <i>J. A. Joubert</i>		DATE <i>7/23/02</i>	TOTAL USAGE - DAYS TO DATE <i>44</i>

③ 7/23/02



Integral Nuclear Associates, LLC

Fax

To: Sheryl Villar From: Janice Harkins
 Fax: (610) 337-5269 Pages: 7 (Including Cover Sheet)
 Phone: _____ Date: 7-22-02
 Re: Revision of Reciprocity CC: _____
 Urgent For Review Please Comment Please Reply Please Process

Comments:

Hi Sheryl,
We would like to revise our reciprocity agreement
by adding 1 day at a different location. Please let
me know if you need anything. Thanks.
Janice Harkins
(610) 993-1640 Ext. 208

If you do not receive this fax in its entirety or if you have received this fax in error, please call our office at 610-993-1640 - ext. 202

Please Note: The information in this FAX is intended only for the personal and confidential use of the designated recipient(s) names above. This message may be an attorney-client communication, and as such is privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error, and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you have received this communication in error, or if any problems occur with this transmission, please notify us immediately by telephone. Thank you.



Integral Nuclear Associates, LLC

July 22, 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: Revision to Reciprocity Request Under New York License Number 5058

Dear Ms. Villar,

We wish to revise our reciprocity with the Nuclear Regulatory Commission under New York State Department of Health Radioactive Materials License Number 5058. Please see the attached NRC Form 241.

Our mobile PET facility will be used at Phoenixville Hospital, 140 Nutt Road, Phoenixville, PA 19460 on Tuesday, July 30. The unit will be for display only (no patients will be done). The other sealed sources are covered under our Pennsylvania mobile PET license PA-0900.

We have previously submitted \$1400 for our annual reciprocity fee. Please let me know if there are any additional fees.

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

Sincerely,



Janice Harkins
Health Physicist

Attachments



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building
P.O. Box 8469
Harrisburg, PA 17105-8469
July 10, 2002

Bureau of Radiation Protection

717-787-3720
Fax: 717-783-8965

Ms. Wendy Rowan
Vice President of Operations
Integral P.E.T. Associates, L.L.C.
Paoli Executive Green II
43 Leopard Rd., Suite 200
Paoli, PA 19301

Re: "NEW" Pennsylvania Radioactive Material License No. PA-0900

Dear Ms. Rowan:

We are enclosing "NEW" Pennsylvania Radioactive Material License PA-0900 in response to an application dated July 3, 2002.

Please read it over carefully and contact me if there are any questions regarding it, as there are several license conditions with significant implications. Please pay particular attention to License Conditions 9, 12, 13, 15 and 16.

You will not need an exemption to 10 CFR 35.29(d), as you requested in Attachment 20 O as the requested exemption is in fact the regulation.

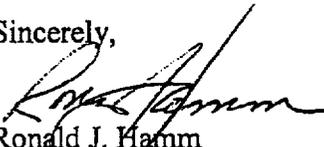
The license has been formatted to reflect changes to the regulations published September 15, 2001 in the Pennsylvania Bulletin. Please note that the Commonwealth of Pennsylvania has "incorporated by reference" the NRC radiation protection regulations contained in 10 CFR Parts 19-150.

Please forward the enclosed material appropriately.

If there are any questions regarding this letter I can be contacted at (717) 783-5919.

Thank you for your cooperation.

Sincerely,


Ronald J. Hamm
Chief

Radioactive Material Licensing

Enclosure: "NEW" Pennsylvania Radioactive Material License PA-0900





COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF RADIATION PROTECTION

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License No. PA-0900
Amendment No. NEW

RADIOACTIVE MATERIALS LICENSE

Pursuant to the Radiation Protection Act, the Act of July 10, 1984 (No. 147, P.L. 688) and Title 25. Rules and Regulations, Article V. Radiological Health of the Pennsylvania Department of Environmental Protection, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the Licensee to receive, acquire, possess, transfer, and use radioactive material listed below for the purposes and at the places designated below. This license shall be deemed subject to all applicable rules, regulations, or orders of the Pennsylvania Department of Environmental Protection now or hereafter in effect and to any conditions specified below.

1. Licensee : In response to an application dated
: July 3, 2002
Integral P.E.T. Associates, L.L.C. :
: 3. License No. PA-0900 is issued as
2. Paoli Executive Green II : follows:
43 Leopard Road, Suite 200 :
Paoli, PA 19301 : 4. Expiration Date: July 31, 2007

5. Radioactive material (Element & mass number)	6. Chemical and/or physical form	7. Maximum amount that licensee may possess at any one time under this license
A. Fluorine 18	A. Fluorodeoxyglucose (FDG)	A. As needed
B. Sodium 22	B. Sealed sources	B. 0.3 millicuries
C. Cobalt 57	C. Sealed sources	C. 6.0 millicuries

8. Authorized Use

- A. Human use imaging and localization and instrument calibration
B. and C. Calibration and reference sources

CONDITIONS

9. The licensee may not possess and use radioactive materials authorized in items 5, 6, and 7 until the licensee has obtained the equipment and contracted with the authorized user and the radiation safety officer as described in the application and supporting documentation.
10. Licensed material may be used at temporary job sites established at client facilities in Pennsylvania. This condition does not prohibit use in an area of exclusive federal jurisdiction or in another State, when approved by the appropriate competent federal or State authority for that venue.
11. Radiation Safety Officer for this license is: Phyllis Hoelsworth.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF RADIATION PROTECTION

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License No. PA-0900
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RADIOACTIVE MATERIALS LICENSE

12. The licensee is authorized to provide PET imaging services to client facilities in Pennsylvania who are authorized to possess and use Fluorine 18 (FDG) provided;
 - (a) services are performed at a client's facility with written permission of the institution's administrator; and,
 - (b) radiopharmaceuticals are used under the client's license, administered by or under the supervision of the client's authorized personnel in the client's facility prior to imaging; and
 - (c) an authorized user under the client's license is responsible for performing or supervising the performance of the PET scan procedure and the subsequent interpretation of clinical data.
13. PET imaging services are authorized to be provided by the licensee to client facilities in Pennsylvania where there is not a current license for human use of Fluorine 18 (FDG) provided that;
 - (a) services are performed at a client's facility with written permission of the institution's administrator; and,
 - (b) radiopharmaceuticals are used under the Integral PET Associates, administered by the Integral PET Associates authorized personnel in the Integral PET Associates facility prior to imaging; and,
 - (d) an authorized user under the Integral PET Associates license is responsible for performing or supervising the performance of the PET scan procedure and the subsequent interpretation of clinical data.
 - (e) Licensed material listed in Item 5 above is authorized for use by or under the supervision of: Abass Alavi, M.D.
14. The licensee shall maintain copies of records necessary to demonstrate compliance with the requirements of this license and the regulations of the Radiological Health. Records shall be available for inspection in the licensee's trailers or at a permanent base of operations in Pennsylvania designated by the licensee.
15. Sealed sources shall be locked up or returned to a shielded position when not in use such that they are secure from unauthorized access while not under the direct surveillance of authorized personnel.
16. Before moving a trailer to a new location, the licensee shall conduct a physical inventory at the conclusion of activities at each site to account for all sources and/or devices received and possessed under the license which were at the site.
17. The licensee shall conduct a physical inventory every 3 months to account for all sealed sources and devices containing licensed material received and possessed pursuant to 10 CFR 35.459, 35.400, and 35.500 incorporated by reference and 6 months for all other sealed sources and devices.
18. The licensee may transport licensed material, or deliver licensed material to a carrier for transport, in accordance with 25 Pa. Code Chapter 230, "Packaging and Transportation of Radioactive Material" and the provisions of 10 CFR Part 71 incorporated by reference.
19. In addition to the possession limits in Item 7, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified and incorporated by reference in 10 CFR 30.35(d), 40.36(b) and 70.25(d) for establishing financial assurance for decommissioning relative to isotopes with half life greater than 120 days.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF RADIATION PROTECTION

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License No. PA-0900
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RADIOACTIVE MATERIALS LICENSE

20. Notwithstanding the requirements set forth in this license, the license shall comply with the regulations set forth in Title 25 of the Pennsylvania Code Article V "Radiological Health" and the U.S. Nuclear Regulatory Commission, Title 10 Code Of Federal Regulations Parts 19-150 incorporated by reference.
21. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The Department of Environmental Protection's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.

A. Application dated July 3, 2002



For the Pennsylvania Department
of Environmental Protection

Date: July 11, 2002


Ronald J. Hamm
Bureau of Radiation Protection
P. O. Box 8469
Harrisburg, PA 17105-8469