



The  
**Cardiac Imaging**  
Center

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MJB  
07

June 21, 1991

Mr. Keith Brown  
U.S. Nuclear Regulatory Commission  
Region I  
Material Safety Branch  
475 Allendale Road  
King of Prussia, Pa 19406

RE: NEW BYPRODUCT MATERIAL LICENSE APPLICATION

Dear Mr. Brown:

Pursuant to your telephone conversation with Scott Surovi, NMA Medical Physics Consultation, I provide you with the following response regarding our pending byproduct material license application:

1. Activity linearity testing of the dose calibrator shall be performed to include the activity of 10 uCi. This is in concurrence with 10 CFR 35.50 (b)(3).
2. As stated in our license application, authorization to use the Calicheck Kit of Lineator testing system is requested. We shall follow the manufacturer's instructions for using either testing system. As stated in the manufacturer's instructions, linearity must be demonstrated via the "decay" method prior to using either linearity kit.

We do not possess either linearity testing kit at this time. However, this request is being made in order to alleviate future licensing action regarding this matter.

3. As stated in our license application, we have committed to Appendix N to Regulatory Guide 10.8, Revision 2 regarding area survey procedures. In order to clarify this matter, our trigger levels for both area surveys

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**NMSS/RGNI MATERIALS-002**

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and area contamination testing shall be as follows:

Area Surveys - 2.0 mR/hr for restricted areas  
0.5 mR/hr for unrestricted areas

Area Contamination Surveys - Appendix N  
2,000 dpm for restricted areas  
20,000 dpm for unrestricted areas

I trust that this response will meet your approval. However, if additional information is required, please contact Scott Surovi, NMA Medical Physics Consultation. Mr. Surovi may be reached at (215) 532-0935. I thank you for your prompt attention regarding our license application process.

Sincerely,

A handwritten signature in cursive script, reading "V. Covalisky", with a long horizontal flourish extending to the right.

VERONICA A. COVALESKY, M.D.

VAC/ss