



Vantage® Mobile Services

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February 3, 2005

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RECEIVED
REGION 1

Mr. Steven Courtemanche
Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety
United States Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

Dear Mr. Courtemanche,

Attached, please find the response to the notification from the NRC, Docket No. 03036771 Control No. 136083, dated, January 7, 2005, regarding the application of Vantage Mobile Service New License.

Should there be further questions or concerns regarding the same, please feel free to call me at your convenience.

Professionally,

William J. Henwood, RPh
Sr. Vice President
Vantage Mobile Services

Enclosure

136083

NMSS/RGN MATERIALS-002

**VANTAGE MOBILE SERVICES, REQUEST FOR ADDITIONAL
INFORMATION CONCERNING APPLICATION FOR NEW LICENSE,
CONTROL NO. 136083**

1. You have requested that Charles A. Giomuso, M.S. be named Radiation Safety Officer (RSO) on your license. It appears that this individual may be an outside consultant/contractor. If this is so, in support of this request, please address the following:
 - a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions. Mr. Giomuso has been given total control over radiological situations that might arise from using radioactive materials on the mobile coach. He provides us with timely reports that detail inspection findings. Should there be any question or problem that arises from a visit, he knows to immediately contact our management to discuss a solution.
 - b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements. The RSO shall make recommendations based on his review of the program and when required and/or to insure the efficacy of the radiation safety program, Vantage Mobile Services will spend the funds necessary to continue the quality, safety and positive outcomes of the program.
 - c. During a review of the NRC database, it was noted that your proposed RSO is listed on numerous NRC and Agreement State licenses. 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 of on-site time (hours per week or as applicable to the program). Mr. Giomuso and his medical physics team of personnel have committed to quarterly on site audits of the mobile coach (s) no matter its whereabouts. Each visit is followed by a detailed report either generated by Mr. Giomuso or reviewed in its entirety by him. All required documents are reviewed each quarter and signed

when deemed necessary. There is an pen line of communication with Mr. Giomuso vis his toll free voice mail/page as well as his cell phone.

- d. Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority. The lead technician followed by William J Henwood, RPh, Sr. VP of Mobile and Clinical Services will serve as this authority upon Mr. Giomuso's absence.
 - e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence. In the event of a radiological concern, Mr. Giomuso would be available to be on site within 8 hours or sooner. He is always available via telephone (cell and voice mail/pager 24 hours a day 7 days a week).
2. Please confirm that the Technetium-99m needed for dose calibrator checks will be delivered directly to the mobile coach and will be received by personnel of Vantage Mobile Services. As stated, the coach has a receiving door and will be handled only by Certified PET technicians who are employed by Vantage Mobile Services.
 3. Please confirm that drivers and technologists will receive training in Department of Transportation regulations and emergency procedures pertinent to transportation in addition to the radiation safety training outlined in your application. All drivers are certified Class B trained and licensed drivers and are administered a drivers examination annually. The Radiation training was added for this modality.
 4. Please confirm that all of your NRC-licensed activities will be performed within your mobile coach and not performed in any NRC-licensed facilities, including private practices within an NRC-licensed medical institution. The coach is equipped with a receiving door for the FDG and will only be handled within the HOT LAB (lead) area of the coach.
 5. Your description of the mobile coach does not include the additional

information requested in Appendix V of NUREG-1556, Volume 9: A description of the construction and design of the coach to protect licensed materials from the elements and to demonstrate compliance with 10 CFR 20.1201 pertaining to radiation levels in the driver's compartment. See attached from the specifications of the manufacturer of the coach.

6. In an effort to update the NRC's ability to communicate with licenses, we request that you provide your main phone number, main facsimile number, and the e-mail address for the proposed RSO.

Phone Number 1-800-715-1214

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RSO: Charles A. Giomuso, MS.,MBA CAG7AMPR@adlephia.net
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