



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

September 27, 2005

Docket No. 03037000
Control No. 137507

License No. 37-31077-01

Chris Rappolt
Hospital Administrator
Animal Emergency Clinic of Wyoming Valley
1120 Vine Street
Avoca, PA 18641

SUBJECT: ANIMAL EMERGENCY CLINIC OF WYOMING VALLEY, REQUEST FOR
ADDITIONAL INFORMATION CONCERNING APPLICATION FOR NEW
LICENSE, CONTROL NO. 137507

Dear Mr. Rappolt:

This is in reference to your application dated August 12, 2005 applying for a Nuclear Regulatory Commission license. In order to continue our review, we need the following additional information:

1. Your license requires that the possession limit for technetium-99 be listed. State the maximum amount of technetium-99m that you will have on site at any one time, including the quantities in storage, in use, and in waste.
2. In your application, you identify Ada M. Guzman, B.S., D.V.M. as your authorized user. Please describe Dr. Guzman's experience with handling technetium-99m, the maximum quantities handled, where the experience was gained, the duration of the experience and the type of use.
3. You have requested that John C. Ramsey 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.
 - 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.

- c. 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).
 - 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.
 - 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.
4. Please provide a detailed description of the training program for radiation workers and ancillary personnel (veterinary technicians, animal handlers, maintenance persons, security guards, etc.). The training given to each group should be commensurate with the duties and responsibilities of the group. The training program must assure that personnel are instructed before assuming duties with, or in the vicinity of, licensed materials and specify a frequency for periodic refresher training. Appendix H and Appendix J of NUREG-1556, Volume 7 addresses radiation safety training topics and may be helpful in developing your response. See also item 7 below.
5. Your application did not address emergency procedures. Please confirm that you will develop and post emergency procedures. Appendix P of NUREG-1556, Volume 7 provides model emergency procedures and may be helpful in developing your procedures.
6. On a detailed version of your facility diagram, please indicate where radiopharmaceuticals (refrigerated and nonrefrigerated) and radioactive waste, including decay-in-storage prior to disposal as nonradioactive waste, will be stored. If these areas are not located within your main department, describe how you will secure the material. Also, describe in each of these areas the type, dimensions, and thickness of shielding that you will use.

In addition, identify adjacent areas across the walls from use and storage locations and show that adequate steps have been taken to assure that radiation levels in unrestricted areas will not result in doses to individual members of the public in excess of those specified in 10 CFR 20.1301 (enclosed).
7. Your request to be authorized for licensed materials to be used in animals will require the following information:
 - a. a description of the training that will be provided to individuals caring for animals containing licensed materials,

- b. a copy of the instructions provided to animal caretakers for handling of animals, animal waste carcasses, and cleaning and decontamination of animal cages while at the veterinary facility,
- c. criteria for release of animals to ensure that doses to members of the public (including the animals' caretakers) will receive doses that within the limits of 10 CFR 20.1301 (less than 100 millirem in a year and less than 2 millirem in any one hour.), and
- d. instructions to animal caretakers upon release, which are specific to the type of radioactive treatment given the animal.

Appendix H of NUREG-1556, Volume 7 addresses considerations for laboratory animal uses and may be helpful to you in developing a response.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, industrial, and academic uses of nuclear material**; then **toolkit index page**. Or you may obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 9:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 137507. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5040.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Sincerely,

Original signed by Elizabeth Ullrich

Elizabeth Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

cc:
John C. Ramsey, Radiation Safety Officer

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