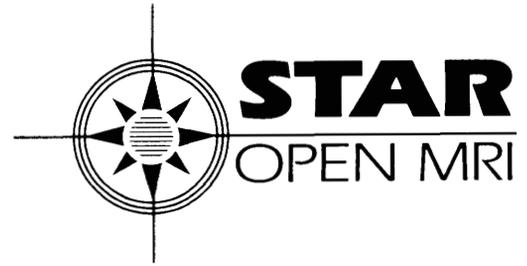




Magnetic Resonance Imaging/Angiography
 Nuclear Medicine-Diagnostic and Cardiac
 Computed Tomography/Angiography
 Bone Densitometry (DEXA)
 General Radiography
 Ultrasound



October 17, 2005

Betsy Ullrich
 Senior Health Physicist
 U.S. Nuclear Regulatory Commission, Region 1
 Division of Nuclear Materials Safety
 475 Allendale Road
 King of Prussia, Pa. 19406

Q-5
 MS-16

2005 OCT 17 PM 1:17
 RECEIVED

Re: NRC License 37-30603-01
 Docket No: 03035594
 Control No: 137620

Dear Ms. Ullrich,

Mr. Payne is our consultant physicist. Our previous RSO was also a consultant physicist. We will address your questions as they appear in your letter of October 6, 2005.

a. In our letter of 9/1/05, we included a "Delegation of Authority" in which it states: *"You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations where justified by radiation safety. You are required to notify management if staff do not cooperate and do not address radiation safety issues."*

This will also apply to our AU when questions or problems relating to radiation safety arise. Our AU is eager to work with Mr. Payne to maintain our program in compliance with NRC regulations.

b. Again, as described in the "Delegation of Authority" we, the management of Advanced Medical Imaging and Nuclear Services are determined to maintain our program within the NRC guidelines and maintaining an "ALARA" philosophy. We will cooperate with Mr. Payne in anyway deemed necessary to maintain strict radiation safety, including the expenditure of funds to facilitate the objectives of our radiation safety program.

Northwood Surgery Professional Building
 3729 Easton-Nazareth Highway • Easton, PA 18045
 Voice 610-253-0439 • Fax 610-559-1324

137620
 NMSS/RGNI MATERIALS-002

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B. Ullrich

U.S. Nuclear Regulatory Commission

- c. Currently Mr. Payne consults for many hospitals and outpatient facilities in Central and Northeastern Pennsylvania. Mr. Payne and his associate, Douglas Heim, serve as RSOs on multiple licenses. These are smaller diagnostic facilities, such as ours, with the exception of Mercy Hospital, Scranton, Pennsylvania, which does therapy procedures. Mr. Payne provides visits to our facility to evaluate our nuclear medicine and diagnostic radiology equipment throughout the year. During each visit, Mr. Payne or his associate meet with our nuclear medicine staff to discuss any issues or concerns they may have. Mr. Payne or Mr. Heim is also available by cell phone, office phone, fax or e-mail, as well. Although Mr. Payne is not here each week, he is certainly available to answer any of our questions.
- d. We will appoint Kris Guthrie, B.S., CNMT, our nuclear medicine technologist, as our point of contact to assist Mr. Payne. In addition, Mr. Payne is assisted by his associate, Douglas Heim, who is also an NRC approved RSO.
- e. Mr. Payne is available to consult with our facility by phone, fax or e-mail or in person as needed. As we are a diagnostic facility and utilize the services of a central radiopharmacy for our patient doses, we would never have a spill which would be considered a "Major Spill" (greater than 100 mCi's – ^{99m}Tc). Because of the types of studies we do, it would be very unlikely that we would ever misadminister a dose to a patient which would require immediate on-site review. In the unlikely event that we would need Mr. Payne on-site beyond his normally scheduled visits, he states that he could respond to an emergency generally within 3 hours of our notification.

If you require any additional information, please feel free to contact me at the number below.

Sincerely,



Carol L. Sabetti, M.S., RT, CRA
Imaging Manager