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January 12, 2006

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U.S. Nuclear Regulatory Commission Region I Nuclear Materials Safety Branch Attn: Licensing Assistance Team/Shirley Xu 475 Allendale Road King of Prussia, PA 19406-1415

Our Lady of Lourdes Medical Center License No. 29-06431-01 Docket No. 03002488 Control No. 137683

Dear Ms. Xu,

In response to your e-mail regarding the naming of Michael Nunno as the Radiation Safety Officer on our NRC License, please know the following:

Question 1:

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.

Answer:

Mr. Nunno will be granted full administrative authority to implement any corrective action necessary to rectify a radiation safety problem arising from any mismanagement or misuse of radioactive material.

Question 2:

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.

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Answer:

Mr. Nunno will discuss with me any need to expend funds to rectify a deficiency in the radiation safety program or to improve it. We will dispense the funds as expeditiously as possible following the institution's procedure for disbursement.

Question 3:

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.

Answer:

Mr. Nunno is already the RSO at Doylestown Cardiac Diagnostics, Doylestown PA, and Southern Ocean County Hospital, Manahawkin, NJ. As a consultant, Mr. Nunno has arranged his schedule to provide the required surveillance and guidance to our program. Based on his many years of assisting us, he has determined that an average of 4 hours per month will be adequate. This time can be increased if radiation safety issues arise which require more of Mr. Nunno's involvement.

Ouestion 4:

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.

Answer:

Mr. David Bye, Supervisor, Nuclear Medicine, will be Mr. Nunno's liaison. Mr. Bye has worked with Mr. Nunno for numerous years on resolving radiation safety problems.

Ouestion 5:

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.

Answer:

Mr. Nunno can always be reached by cellphone. We communicate with him often using this method. Mr. Nunno lives less than 30 minutes from Our Lady of Lourdes, and is approximately 75 minutes from every other facility he services.

If you have any other questions, or require any additional information, please do not hesitate to contact me.

Sincerely,

Joanne Gianndrea
Vice President of Operations
Our Lady of Lourdes Medical Center