

**From:** Tara Weidner  
**To:** Wvanliew@cityhospital.org  
**Date:** Tue, Jan 24, 2006 12:01 PM  
**Subject:** NRC Request for Additional Information

Licensee: City Hospital  
License No.: 47-15501-01  
Docket No.: 030-09218  
Control No.: 138024

To: Willian VanLiew:

***PLEASE SEND AN E-MAIL TO CONFIRM RECEIPT OF THIS MESSAGE***

In order to complete the request to add Dr. Sanjay Saluja to your license I will need written documentation of his training as required by 10 CFR 35.190, 35.290 and 35.590.

1. In order for a physician to be considered for the use of unsealed byproduct material for uptake, dilution, and excretion studies, the physician must complete 60 hours of training and experience, including a minimum of 8 hours classroom and laboratory training, in basic radionuclide handling techniques applicable to the medical use of unsealed byproduct material for uptake, dilution, and excretion studies.

The **classroom and laboratory** training (minimum of 8 hours) must include:

1. Radiation physics and instrumentation;
2. Radiation protection;
3. Mathematics pertaining to the use and measurement of radioactivity;
4. Chemistry of byproduct material for medical use; and
5. Radiation biology.

The **work experience**, under the supervision of an authorized user who meets the requirements of 35.190, 35.290, or 35.390, or, before October 24, 2005, 35.910, 35.920, or 35.390, or equivalent Agreement State requirements, must include:

1. Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation surveys;
2. Performing quality control procedures on instruments used to determine the activity of dosages and performing checks for proper operation of survey meters;
3. Calculating, measuring, and safely preparing patient dosages;
4. Using administrative controls to prevent a medical event involving the use of unsealed byproduct material;
5. Using procedures to contain spilled byproduct safely and using proper decontamination procedures; and
6. Administering dosages of radioactive drugs to patients.

Lastly, the physician must obtain **written attestation**, signed by a preceptor authorized user who meets the requirements in 35.190, 35.290, or 35.390, or, before October 24, 2005, 35.910, 35.920, or 35.930, or equivalent Agreement State requirements, **stating that the individual has satisfactorily completed the requirements in paragraph 35.190(a)(1) or 35.190(c)(1) and has achieved a level of competency sufficient to function independently as an authorized user for the medical uses authorized under § 35.100.**

2. In order for a physician to be considered for the use of unsealed byproduct material for imaging and localization studies the physician must complete 700 hours of training and experience, including a minimum of 80 hours classroom and laboratory training, in basic radionuclide handling techniques applicable to the medical use of unsealed byproduct material for imaging and localization studies.

The **classroom and laboratory training** (minimum of 80 hours) must include:

1. Radiation physics and instrumentation;
2. Radiation protection;
3. Mathematics pertaining to the use and measurement of radioactivity;
4. Chemistry of byproduct material for medical use; and
5. Radiation biology.

The **work experience**, under the supervision of an authorized user who meets the requirements in 35.290, or 35.290(c)(1)(ii)(G) and 35.390, or before October 24, 2005, 35.920, or equivalent Agreement State requirements, must include:

1. Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation surveys;
2. Performing quality control procedures on instruments used to determine the activity of dosages and performing checks for proper operation of survey meters;
3. Calculating, measuring, and safely preparing patient dosages;
4. Using administrative controls to prevent a medical event involving the use of unsealed byproduct material;
5. Using procedures to contain spilled byproduct safely and using proper decontamination procedures;
6. Administering dosages of radioactive drugs to patients; and
7. Eluting generator systems appropriate for preparation of radioactive drugs for imaging and localization studies, measuring and testing the eluate for radionuclidic purity, and processing the eluate with the reagent kits to prepare labeled radioactive drugs.

The physician must obtain **written attestation**, signed by a preceptor authorized user who meets the requirements in 35.290 or 35.390 and 35.290(c)(1)(ii)(G), or, before October 24, 2005, 35.920, or equivalent Agreement State requirements, **stating that the individual has satisfactorily completed the requirements in paragraph 35.290(a)(1) or 35.290(c)(1) and has achieved a level of competency sufficient to function independently as an authorized user for the medical uses authorized under 35.100 and 35.200.**

3. In order for a physician to be considered for the use of a diagnostic sealed source for use in a device authorized under 35.500, the physician must have completed 8 hours of classroom and laboratory training in basic radionuclide handling techniques specifically applicable to the use of the device.

The **training** must include:

1. Radiation physics and instrumentation;
2. Radiation protection;
3. Mathematics pertaining to the use and measurement of radioactivity; and
4. Radiation biology; and
5. Use of the device containing the requested sealed source.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing, by letter or facsimile (610-337-5269), referencing mail control 138024 and **signed by a member of hospital management**. Please leave a voicemail (610-337-5272) or e-mail message to alert me to look for your response. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.

If you would like to discuss your response prior to submitting, you may call me at 610-337-5272.

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**Subject:** NRC Request for Additional Information  
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**From:** Tara Weidner

**Created By:** TLW@nrc.gov

**Recipients**  
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