



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

TELEFAX TRANSMITTAL

DATE: 8/7/06 NUMBER OF PAGES: 4
(including this page)

SEND TO: MARCIA WEST CONSULTANT FOR

LOCATION: MERITAS HEALTH CORP.

FAX NUMBER: 816-966-2040 ~~816-313-437~~ VERIFY BY CALLING SENDER

FROM: COLLEEN CAROL CASEY
(SENDER)

TELEPHONE NUMBER: 630-829-9841 FAX NUMBER: 630-829-9782

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MESSAGE

*Please call me if you have questions.
Thank you.
Colleen Carol Casey*

NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by telephone and return the original to the above address, by U.S. Mail. Thank you.

**COLLEEN CAROL CASEY
MATERIALS LICENSING BRANCH
UNITED STATES NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD STE 210
LISLE, ILLINOIS 60532-4352
OFFICE: (630)-829-9841 FAX: (630) 829-9782 or (630) 515-1259

CONVERSATION RECORD

|TIME

|DATE

ACTUALLY FAXED? YES.

~ 2:45 pm on

August 7, 2006

NAME OF PERSON(S) CONTACTED
Marcia West, consultant

ORGANIZATION
Meritas Health Corporation

TELEPHONE NO.
816-807-8090
FAX: 816-313-1437

(C3 + Marcia West telephone)

SUBJECT

License No.: 24-32275-01

Control No.: **315427 NOTE DIFFERENT CONTROL NUMBER**

SUMMARY

We have reviewed your letters dated November 1, 2005, and April 27, 2006, requesting an amendment to your byproduct materials license and find that we need additional information as follows:

We cannot approve your request to include Kevin Jones, D.O. as an authorized user at this time because of the following problems and discrepancies with his training and experience as presented on his preceptor forms:

1. **ORIGINAL DEFICIENCY:** *Dr. Jones claims he received 100 hours of didactic training in each of two five-day periods, June 15-19, 2005, and September 22-, 2004. This translates to Dr. Jones being in an active training status continuously for an average of 20 hours per day for each of the 10 days claimed. As there are only 24 hours in a day, it appears that the training hours claimed per day and per week may have been overestimated. However, it also appears that Dr. Jones' training certificates corroborate these claims.*

I find it highly unlikely that Dr. Jones trained actively as claimed in these courses. Please provide an explanation for these discrepancies and, if necessary, please revise Dr. Jones' application and support any changes made. If revised preceptor forms are appropriate, have them currently signed and dated and submit them also.

NEW DEFICIENCIES: Dr. Jones has now submitted revised preceptor forms and didactic training information that shows different dates of training than originally attested to and corroborated by the Institute for Nuclear Medical Education certificates. Specifically, Dr. Jones now claims to have taken his training from September 18, 2004 - September 26, 2004, instead of from September 22 - 26, 2004, as he originally claimed; and from June 11 -19, 2005, instead of from June 15 - 19, 2005, as originally claimed. This is a total of 8 additional days of training that Dr. Jones failed to claim in his original application in the letter dated November 1, 2005.

However, the change in starting dates of these training terms are not corroborated by Dr. Jones' Institute for Nuclear Medical Education certificates. Please submit sufficient evidence, preferably objective, that corroborates Dr. Jones' attendance at the Institute for Nuclear Medical Education during the revised dates he has attested to. Revised and currently dated Institute for Nuclear Medical Education certificates may be a part of this evidence.

In addition, the training schedule included in the April 27, 2006, letter shows a "typical" schedule of hours. Please provide the actual schedule of hours for each individual date when Dr. Jones attended training at the Institute for Nuclear Medical Education.

Please also be reminded of the provisions in 10 CFR 30.9(a), "Completeness and accuracy of information,"..."(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

2. As I cannot presently accept the 200 hours of didactic training claimed by Dr. Jones and as 10 CFR 35.290(c) requires a minimum of 700 hours total training and experience and as Dr. Jones' preceptors attested to his completion of only 500 hours of clinically supervised training and experience, it therefore appears that Dr. Jones cannot meet the minimum 700 hours total training and experience required.

Please review Dr. Jones' application carefully and submit any updated or current training and experience he may have received.

3. Dr. Jones' supervised clinical training and experience did not appear to include the elements circled on the attached copy of 10 CFR 35.290(c). Please re-submit Dr. Jones' application after he has completed this required training and include revised, currently signed and dated preceptor forms at that time.
4. In responding to the above items, please do not submit resumes, CV's, or personal, proprietary information that we must protect, in accordance with 10 CFR 2.390, such as social security numbers, dates of birth, home addresses or phone numbers, patient records, college transcripts, etc. Please do not submit extraneous documents.

Please refer to the above regulatory requirements as well as section 8.11, item 7 and Appendices B, D and E in NUREG 1556, Vol. 9, Rev. 1, for assistance in preparing your response.

Please also note that a new rulemaking became effective April 29, 2005, which changed many key elements in the training and experience criteria in Part 35. More information on this rule should have been sent to you already and is available on our website at <http://www.nrc.gov>.

If you have further questions concerning these matters please contact me at (630) 829-9841 or (800) 522-3025.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's

document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

ACTION REQUIRED

As we cannot issue an amendment at this time we are voiding this request in order to enable you to prepare a quality application without time constraints. This is done without prejudice to the resubmission of your request at a later date. Upon receipt of your response we will resume our review. Address your written response to my attention at the above address and reference it as additional information to control number 315427 to ensure proper handling.

PLEASE NOTE THAT A "VOID" IS AN ADMINISTRATIVE PROCEDURE THAT PUTS YOUR AMENDMENT REQUEST "ON HOLD" (TAKES IT OUT OF OUR ACTIVE CASEWORK DATABASE) UNTIL YOU REACTIVATE IT VIA SUBMISSION OF A WRITTEN RESPONSE. IT "BUYS" YOU TIME TO PREPARE A QUALITY RESPONSE AND IS GENERALLY REGARDED AS A "GOOD THING."

PLEASE DIRECT ANY QUESTIONS YOU MAY HAVE TO ME AT (630) 829-9841 or (800) 522-3025.

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

Colleen Carol Casey



August 7, 2006

TRANSMISSION VERIFICATION REPORT

TIME : 08/07/2006 15:03
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FAX : 6308299782
TEL : 6308299782

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MESSAGE

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D. K. [unclear]