



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

October 27, 2006

Docket No. 03037355  
Control No. 139536

License No. 29-31195-01

Sunil Khanna, M.D.  
Owner  
Metuchen Cardiology Associates  
579 Main Street  
Metuchen, NJ 08840

**SUBJECT: METUCHEN CARDIOLOGY ASSOCIATES, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR NEW LICENSE, CONTROL NO. 139536**

Dear Dr. Khanna:

This is in reference to your application dated October 2, 2006 applying for a Nuclear Regulatory Commission license. In order to continue our review, we need the following additional information:

1. The experience elements as required by 10 CFR 35.290(c)(ii) were not listed as specific as needed in the attestation statement by Dr. Ramon S. Lao for Dr. Sunil Khanna. These experience elements are:
  - a. Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation surveys;
  - b. Performing quality control procedures on instruments used to determine the activity of dosages and performing checks for proper operation of survey meters;
  - c. Calculating, measuring, and safely preparing patient or human research subject dosages;
  - d. Using administrative controls to prevent a medical event involving the use of unsealed byproduct material;
  - e. Using procedures to safely contain spilled radioactive material and using proper decontamination procedures; and
  - f. Administering dosages of radioactive drugs to patients or human research subjects, and

- g. 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 reagent kits to prepare labeled radioactive drugs.

Please include these experience elements, clock hours, dates of experience, location, and name of supervising individual in an attestation statement signed by a qualified authorized preceptor.

2. Please confirm that the structured educational program submitted by the Certificates from the Institute for Nuclear Medical Education contained mathematics pertaining to the use and measurement of radioactivity and radiation biology as required by 10 CFR 35.290(c)(1)(i).
3. Dr. Sunil Khanna does not appear to be qualified for the Radiation Safety Officer of this proposed license based on the information submitted. Please review the requirements as stated in 10 CFR 35.50 and submit additional information supporting 10 CFR 35.50 requirements. Alternatively, please propose another candidate, along with their qualifications to be the Radiation Safety Officer.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://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. 139536. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5366.

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 Dennis R. Lawyer***

Dennis R. Lawyer  
Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety

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**SUNSI Review Complete: DLawyer**

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