



December 18, 2006

Sandy F. Frazier  
US Nuclear Regulatory Commission  
Region III – Division of Nuclear Materials Safety  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

RE: Amendment Request for Consolidated NRC License 34-29200-01MD, Cardinal Health,  
Dublin, OH.

Dear Ms. Frazier:

Cardinal Health Nuclear Pharmacy Services (hereafter Cardinal Health) wishes authorization to self-approve Authorized Users (AU) for handling of radioactive materials without having to request and receive an amendment naming the person as an AU. This is similar in nature to the authorization for Cardinal Health to self-approve Authorized Nuclear Pharmacists (ANP). Any AU who handles radioactive materials for radiopharmaceutical use will always do so under the supervision of an ANP.

#### **Training for Authorized Users**

An AU will have a minimum of 200 hours formal didactic training in the following topics:

- Radiation physics and instrumentation
- Radiation protection and regulations
- Mathematics pertaining to the use and measurement of radioactivity
- Radiation biology

In addition, an AU who will handle radiopharmaceuticals under the supervision of an ANP will have training in:

- Chemistry of byproduct material for medical use

All AUs will have training of at least 120 hours handling quantities of radioactive material of activity normally encountered during the course of employment. These training hours are supervised by an AU or ANP. An AU who will handle radioactive materials for radiopharmaceutical use will receive 380 hours additional training, and all 500 hours will be under the supervision of an ANP.

#### **Approval of Authorized Users**

Approval of an AU will be by vote of the Radiation Safety Committee (RSC). A majority of members of the RSC must vote affirmatively for an AU to be approved, and the Corporate Radiation Safety Officer (CRSO) must be one of those to vote affirmatively. Once approved, the AU will be added to a Master AU Listing and a Notification of Approval will be forwarded to the facility at which the AU will normally work. Documentation of training and RSC approval is filed

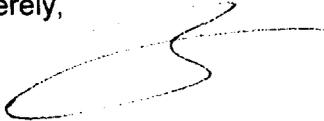
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for inspection at Cardinal Health's corporate offices in Dublin, Ohio. Documentation Notification of Approval will be maintained as well at the facility at which the AU normally works. All documentation is maintained for three years after the last date of employment as an AU.

The Master AU Listing will be a formal document similar to the Master ANP Listing utilized by Cardinal Health. This proprietary listing will be available for inspection at all facilities that operate under this license.

Please contact me at 614.757.3116 with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Breuning", with a stylized flourish extending to the right.

Dave Breuning  
Health Physicist

cc: NRC Consolidated Amendment Request File (3)

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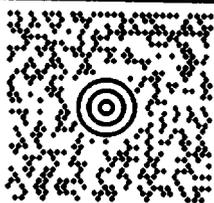
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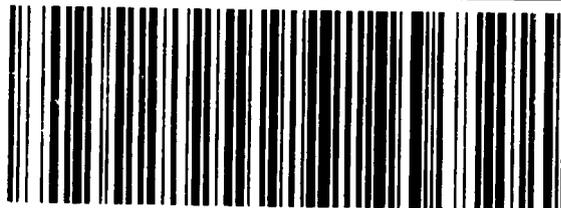
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