



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

January 20, 2007

Docket No. 03033303
Control No. 139824

License No. 45-25272-01

Dinesh K. Bhatt, M.D.
CEO
Southeastern Imaging
287 West Commonwealth Boulevard
Martinsville, VA 24112

SUBJECT: SOUTHEASTERN IMAGING, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL NO. 139824

Dear Dr. Bhatt:

This is in reference to your letter dated December 5, 2006. We are processing this letter as a request to amend Nuclear Regulatory Commission License No. 45-25272-01. Donna Janda was recently promoted to a different job. Therefore, I was assigned to respond to your letter. In order to continue our review, we need the following additional information:

1. Your letter requests to name you as Radiation Safety Officer (RSO). Please provide the following additional information, as required by 10 CFR 35.50:
 - a. Documentation that you have received training required by 10 CFR 35.50(e), in the radiation safety, regulatory issues, and emergency procedures for the types of use authorized on your license (e.g., 35.100 and 35.200).
 - b. A written attestation, signed by a preceptor RSO, that you are currently an authorized user on this license, have satisfactorily completed the requirements in 10 CFR 35.50(e), and have achieved a level of radiation safety knowledge sufficient to function independently as an RSO for a medical use licensee.
2. Your letter appears to request authorization for you to discontinue monitoring of personnel radiation exposures. 10 CFR 20.1502 requires you to perform personnel radiation monitoring for adults likely to receive more than 10% of the occupational dose limits in 20.1201. Under the current NRC performance-based approach to regulation, we ask licensees to make their own determination of whether monitoring is needed. You can do this by performing and keeping on file evaluations of the occupational doses your personnel have received in the past and are likely to receive in the future, and comparing these with the occupational dose limits. We are unable to authorize you to discontinue personnel radiation monitoring. However, you may request to replace your current license commitment for personnel radiation monitoring with the following commitment: "Either we will perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will provide dosimetry that meets

D. Bhatt
Southeastern Imaging

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the requirements listed in "Criteria" in NUREG-1556, Vol. 9, Rev. 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Medical Use Licensees."

3. Your letter appears to refer to a recommendation from Donna Janda to "simplify equipment and nuclear sources monitoring." Please clarify the specific request you wish to make.
4. Your license authorizes mobile use of NRC-licensed material at temporary job sites. Donna Janda informed me that you currently perform licensed activities only at the fixed site at 287 Commonwealth Boulevard. She also said that she asked you to consider amending your license to remove the authorization for mobile use. Because the NRC typically inspects mobile licensees more frequently than fixed site licensees, this change could potentially result in less frequent NRC inspections. Do you wish to amend your license to remove your authorization for mobile use at temporary job sites?
5. Your license is issued to Southeastern Imaging. Your letterhead shows your corporate name as Southeastern Imaging, P.C. Should the name on your license be changed to Southeastern Imaging, P.C.?

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, Academic, and Industrial 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 8:00 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. 139824. If you have any questions regarding this letter, please call me at (610) 337-5182 or send an e-mail message to slg2@nrc.gov.

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 the requests in your letter.

Sincerely,

Original signed by Sandra Gabriel

Sandra Gabriel
Senior Health Physicist
Medical Branch
Division of Nuclear Materials Safety

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SUNSI Review Complete: SGabriel

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