

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) 515-1078

CONVERSATION RECORD

	TIME	DATE
ACTUALLY FAXED? YES.	C ³ left VM msg, 3/23/07 6:53 pm CT.	3/23/07

NAME OF PERSON(S) CONTACTED	ORGANIZATION	TELEPHONE NO.
Dan Marshall, DVM	(same name practice)	586-463-9550 FAX 586-463-9534

SUBJECT
License No.: 21-26539-01 Control No.: 315991

SUMMARY
We have reviewed your letter dated 1/17/07 + 2/21/07 requesting an amendment to your byproduct materials license and find that we need additional information as follows:

- Both letters request same thing - add Kristen Stallings, DVM as an authorized user. (Note: one letter would have been sufficient.)
Please see attached excerpt from NUREG 1556 Vol. 7, Appendix H - we are looking for 40 hours of training in specific subjects. It is not clear from your letters that the specified subjects were covered in Dr. Stallings' training.
Also, her 5 hours of training is much too brief as opposed to the 40 hours - standard.
Please resubmit Dr. Stallings' application at a later date when she has completed the additional 35 hours of training and please ensure / confirm that the requisite topics are covered.

We will be unable to continue processing your request until we receive this information.

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."

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically 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>.

ACTION REQUIRED

1. Submit the requested information within _____ calendar days (by _____, 2006) by referencing control number **31** to facilitate proper handling. If we do not receive an adequate response by this date, we will **VOID** the current action without attempting to contact you further and without prejudice to resubmission of your request at a later date. Upon receipt of your response we will reactivate placement of your request in our database and resume our review. Address your written response to my attention at the above address.

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 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

2. 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.

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

A handwritten signature in cursive script that reads "Colleen Carol Casey". The signature is written in black ink and is positioned in the center of the document, between the printed name and the date.

March 23, 2007

APPENDIX H

Special care should be observed when cleaning the cage or stall. The cage or stall, the bedding, and waste from the animal may contain radioactive material. Any radioactive material should be properly disposed of as described in Section 8.11, "Waste Management."

Disposal of laboratory animals that contain radioactive material require special procedures. Animal carcasses that contain less than 1.85 kBq/gram (0.05 microcuries/gram) of carbon-14 or hydrogen-3 may be disposed of by the same method as non-radioactive animal carcasses. Animal carcasses that contain byproduct material with a half-life of less than 120 days may be allowed to decay-in-storage in a freezer dedicated for radioactive material. Animal carcasses must be held for a minimum of 10 half-lives of the longest lived isotope. After 10 half-lives, the animal carcasses may be disposed as non-radioactive, if radiation surveys (performed in a low background area and without any interposed shielding) of the carcasses at the end of the holding period indicate that radiation levels are indistinguishable from background (See section 8.11, "Waste Management").

Animals Used for Research in the Environment

Before a researcher releases an animal that has been injected with a radiopharmaceutical or has had radioactive seeds implanted, the researcher will ensure that the dose that members of the public will receive from the animal is within limits of 10 CFR 20.1301. 10 CFR 20.1301 requires that the total effective dose equivalent to an individual member of the public from the licensed operation does not exceed 1 mSv (0.1 rem) in a year and that the dose in any unrestricted area from external sources does not exceed 0.02 mSv (0.002 rem) in any one hour. Further, the researcher may be required to perform an assessment of the impact the byproduct material will have on the environment (See section "Purpose(s) for Which Licensed Material Will Be Used").

Veterinary Use

Training

NRC believes that to demonstrate adequate training and experience, the veterinarian should have training and experience commensurate with the scope of proposed activities. Training should include the following subjects:

- Radiation Protection Principles
- Characteristics of Ionizing Radiation
- Units of Radiation Dose and Quantities
- Radiation Detection Instrumentation

- Biological Hazards of Exposure to Radiation (appropriate to the types and forms of byproduct material to be used)
- Hands-on Use of Radioactive Materials.

The length of the training (usually 40 hours) will depend upon the type, form, quantity and proposed use of the licensed material requested, but training shall cover the subjects stated.

Contamination Control and Waste Handling

See above section, "Laboratory Animals."

Release of Animals

Before a veterinarian releases an animal that has been injected with a radiopharmaceutical or has had radioactive seeds implanted, the veterinarian must ensure that the dose that members of the public (including the animal's caretaker) will receive from the animal is within limits of 10 CFR 20.1301. 10 CFR 20.1301 requires that the total effective dose equivalent to an individual member of the public from the licensed operation does not exceed 1 mSv (0.1 rem) in a year and the dose in any unrestricted area from external sources does not exceed 0.02 mSv (0.002 rem) in any one hour. Furthermore, licensees should provide instructions to the animal's caretaker to keep doses ALARA.

Instructions to Animal Caretaker Upon Release

The instructions should be specific to the type of treatment given, such as permanent implants or radioiodine for hyperthyroidism or thyroid carcinoma, and they may include additional information for individual situations. The instructions should not, however, interfere with or contradict the best medical judgment of the veterinarian. The instructions should include the name of a knowledgeable person to contact and that person's telephone number, in case the caretaker has any questions. Additional instructions appropriate for each modality, as shown in examples below, may be provided.



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

TELEFAX TRANSMITTAL

DATE: 3/23/07 NUMBER OF PAGES: 6
(including this page)

SEND TO: DAN H. MARSHALL, DVM

LOCATION: (same)

FAX NUMBER: 586-463-9534 **VERIFY BY CALLING SENDER**

FROM: COLLEEN CAROL CASEY
(SENDER)

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

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.

MESSAGE *Please call me if you have questions.*
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.