

Stan A. Huber Consultants, Inc.

Health Physics and Radiation Safety Services

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June 1, 2007

James R. Mullauer, M.H.S. Health Physicist Licensing Branch U.S. NRC Region III 2443 Warrenville Road, Suite 210 Lisle. (Ilinois 60532-4352

RE: Additional Information regarding Lorin M. Brown, M.D., P.C., NRC Radioactive Materials License #13-32269-01, 030-35556, CN 316193, Amendment Request Letter dated 4/26/07

Dear Mr. Mullauer:

This is supporting information in reply to your questions concerning the RSO support to Lorin Brown, M.D., P.C. This support will be provided on a temporary basis to complete the training requirements of their Nuclear Medicine Technologist to be designated RSO.

- 1. I currently provide RSO services at two NRC licensed facilities. At both of these facilities there is a designated Assistant RSO who takes care of the daily responsibilities and I am on site either monthly or every other month. For the Lorin M. Brown, M.D., P.C. facility I will establish reliable methods for them to contact me at any time for routine issues and for emergencies by cell phone, email, fax or telephone at either my office or home. In addition to my office's 24-hour answering service, my company employs three other full time health physicists to provide radiation support for any emergencies. Only on rare occasions am I unavailable for more than 1-2 hours due to personal or work related items.
- In the event of an actual emergency I can routinely be on site from my home or office within 2 hours. Another health physics consultant from my office will be dispatched as my delegate if I am unavailable. Their credentials include Bachelor or Master in Health Physics degrees and a Certified Health Physicist. I should always be available at a minimum by phone.
- Reports will be made in writing to management of any unsafe practices and incidents that may have occurred. This documentation will identify the situation and also make recommendations for corrective actions or

responding to the issues. The written reports can be from on site visits or from observations reported by the RSO delegate.

I will perform routine visits to the facility on a quarterly basis. Written 4. reports will be made to management on the condition of the license and the training status of the RSO delegate. A procedure has already been implemented for the RSO delegate to submit monthly written reports to me as the RSO. These monthly reports will include as a minimum a current status of the work conditions on site. Other items that will be included are quarterly inventory, dose calibrator linearity, dosimetry reports and any other regulatory requirements. These items will be reviewed by me and returned to the facility. Stan A. Huber Consultants, Inc. already provides semi-annual leak testing and annual calibration services to the facility and will continue to do so. Annual program reviews will be completed as required by the regulations. The RSO delegate and I will complete a joint review of the program when the duties are transferred. A training date has been established in August 2007 for the RSO delegate to attend a Radiation Safety Officer Management course at my office. It is expected that the RSO delegate should be prepared to assume the RSO duties as early as October 2007. The amendment request will be prepared and submitted to the NRC as early as possible.

For additional questions concerning the RSO support at this facility please contact me through my office at 800-383-0468 or directly via my cell phone at 815-370-6538.

Sincerely,

James C. Hatten

Senior Health Physics Consultant