

**ESSEX CARDIOLOGY GROUP
769 Northfield Avenue - Suite 130
West Orange, New Jersey 07052**

U.S. Nuclear Regulatory Commission, Region I
Licensing Assistance Section
Nuclear Materials Safety Branch
475 Allendale Road
King of Prussia, Pa. 19406-1415

MS 16

K-4

Re: Request for additional information

29-31276-01

Docket No. #03037543

Control No. #141049

September 27, 2007

Dear Mr. Courtemache:

- 1) Dr. Stephen Levy is named the Administrative Director of Essex Cardiology Group.
- 2(a) The "Delegation of Authority" is attached and describes the RSO's delegation of authority over authorized users for the radiation safety program.
- 2(b) The "Delegation of Authority" is attached and describes the relationship between the RSO and management regarding expenditure of funds for the radiation safety program.
- 2(c) Dr. Stephen Verdesca is the RSO and authorized user for Comprehensive Cardiovascular Consultants, 299 Madison Avenue, Morristown, NJ. NRC License #29-30755-01. (This is the only other RSO commitment.) Dr. Verdesca will physically be present at least once per quarter at our facility overseeing the duties of the RSO.
- 2(d) The in-house representative for the RSO will be the chief technologist, Abraham Mathew, ARRT, and will serve as the point of contact.
- 2(e) The RSO will have immediate telephone availability (24/7). The maximum amount of time to respond on site in an emergency will be one hour. If the RSO is unavailable, a board certified physicist is also available by telephone (24/7)
- 3) **PLEASE NOTE:** Licensed operations will NOT cease on October 1, 2007, Licensed operations will only cease concurrent with the issuance of a new license.
- 4) All surveys, wipe tests and quality control will continue as required by our current license conditions. We commit that we will be responsible for any facility decontamination and disposal or transfer of the sealed sources.

141049

NMSS/RGN1 MATERIALS-002

- 5) Ludlum 14C Geiger Mueller Counter with pancake probe will be used for surveys. Ludlum 2200 NaI wipe test counter #160755 will be used for wipe tests.
- 6) Attached is Item 9, Facility Diagram of Appendix C, Table C.3 of NUREG -1556, Vol. 9., Rev. 2.


Thank you in advance for your cooperation. We look forward to receiving our new license.

Please contact Elaine Rovazzi, M.S., DABR @ 973-322-5118 if you need additional information.

Sincerely,



Stephen Levy, M.D.
Administrative Director, Essex Cardiology Group



Stephen Verdesca M.D.
Authorized User / RSO Essex Cardiology Group

Enc. Delegation of Authority
Appendix C, Table C.3 of NUREG-1556, Vol. 9, Rev. 2

**ESSEX CARDIOLOGY GROUP
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DELEGATION OF AUTHORITY

To: All Employees

**From: Stephen Levy, M.D.
Administrative Director**

Subject: Delegation of Authority

Stephen Verdesca, M.D. has been appointed Radiation Safety Officer and is responsible for ensuring the safe use of radiation. The Radiation Safety Officer is responsible for managing the radiation safety program; identifying radiation safety problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; and ensuring compliance with regulations. The Radiation Safety Officer is hereby delegated the unrestricted authority necessary to meet those responsibilities.

The RSO will also ensure that any authorized users that may be added to the license adhere to the radiation safety program.

Adequate funding is authorized for all expenditures related to recommendations made by the Radiation Safety Officer in order to facilitate the objectives of the radiation safety program and related regulatory requirements.



**Stephen Levy, M.D.
Administrative Director**



Date



Table C.3 Items 7 through 11 on NRC Form 313: Training & Experience, Facilities & Equipment, Radiation Protection Program, and Waste Disposal (Check all applicable rows and fill in details and attach a copy of the checklist to the application or provide information separately.)		
Item Number and Title	Suggested Response	Check box to indicate material included in application
Item 9: Other Equipment and Facilities	Guidance in Section 5.2 was reviewed and security-related information provided is marked accordingly.	<input checked="" type="checkbox"/>
	Attached is a description identified as Attachment 9.4, of additional facilities and equipment.	<input type="checkbox"/>
	For manual brachytherapy facilities, we are providing a description of the emergency response equipment.	<input type="checkbox"/>
	For PET radionuclide use, PET radioactive drug production, and radiopharmaceutical therapy programs, we are providing a description of the additional facilities and equipment for these uses.	<input type="checkbox"/>
	For teletherapy, GSR, and remote afterloader facilities, we are providing a description of the following: <ul style="list-style-type: none"> Warning systems and restricted area controls (e.g., locks, signs, warning lights and alarms, interlock systems) for each therapy treatment room; Area radiation monitoring equipment; Viewing and interroom systems (except for LDR units); Steps that will be taken to ensure that no two units can be operated simultaneously, if other radiation-producing equipment (e.g., linear accelerator, X-ray machine) are in the treatment room; Methods to ensure that whenever the device is not in use or is unattended, the console keys will be inaccessible to unauthorized persons; and Emergency response equipment. 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Item 10: Safety Procedures and Instructions	Attached are procedures required by 10 CFR 35.610.	<input type="checkbox"/>
	Guidance in Section 5.2 was reviewed and security-related sensitive information provided is marked accordingly.	<input type="checkbox"/>
Item 10: Occupational Dose	A statement that: "Either we will perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in 1 year, a radiation dose in excess of 10% of the allowable limits in 10-CFR Part 20 or we will provide dosimetry that meets the requirements listed under "Criteria" in NUREG-1556, Vol 9, Rev. 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Medical Use Licensees."	<input type="checkbox"/>
	OR	
	A description of an alternative method for demonstrating compliance with the referenced regulations.	<input type="checkbox"/>