

January 17, 2008

United States Nuclear Regulatory Commission  
Region III, Materials Licensing  
2442 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

Re: Amendment to NRC License No. 21-26532-01  
Universal Imaging, Inc.

Dear Sir/Madam:

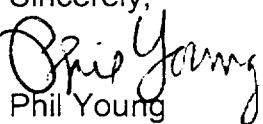
We would like to amend our current NRC license to reflect the following changes:

**Item #1** Please remove the following individual as the Radiation Safety Officer:  
Michelle L. Kritzman, M.S.

**Item #2** Please list the following individual as the Radiation Safety Officer on  
our NRC license:  
Kevin B. Miller, B.S.

Mr. Miller is currently listed as a Radiation Safety Officer on the following NRC  
license #21-32616-01.

If you have any questions or require additional information, please contact our  
physics consultant, Kevin B. Miller, Medical Physics Consultants at 734-662-3197.

Sincerely,  
  
Phil Young  
President  
Universal Imaging, Inc.

**UNIVERSAL  
TECHNOLOGY**

| MRI (magnetic  
resonance imaging)  
| PET, PET/CT  
(positron emission  
tomography)  
| CT (computed  
tomography)  
| Nuclear medicine  
| Ultrasound  
| Fluoroscopy  
| Bone densitometry  
| Routine X-rays

**UNIVERSAL  
LOCATIONS**

**AUBURN HILLS**

3100 Cross Creek Pkwy  
Suite 120  
Auburn Hills, MI 48326  
Tel 248.370.8980  
Fax 248.370.8970

**DEARBORN HEIGHTS**

8560 Silvery Lane  
Suite A-100  
Dearborn Hgts, MI 48127  
Tel 313.359.1655  
Fax 313.216.1012

**YPSILANTI**

1159 E. Michigan Ave.  
Ypsilanti, MI 48198  
Tel 734.445.0111  
Fax 734.528.0625

**TROY (MRI, PET, PET/CT ONLY)**

4600 Investment Dr.  
Suite 160  
Troy, MI 48098  
Tel 248.312.0294  
Fax 248.312.0091

January 2, 2008

Re: Radiation Safety Officer / Executive Management  
Letter of Understanding

**UNIVERSAL  
TECHNOLOGY**

MRI (magnetic resonance imaging)  
PET, PET/CT (positron emission tomography)  
CT (computed tomography)  
Nuclear medicine  
Ultrasound  
Fluoroscopy  
Bone densitometry  
Routine X-rays

Dear Mr. Miller:

You have been appointed the Radiation Safety Officer (RSO) of this facility for our United States Nuclear Regulatory Commission Materials License. This "Letter of Understanding" is prepared to comply with Title 10 Code of Federal Regulations (CFR) Part 35.24(b). This section of the regulations requires that you agree in writing to the following:

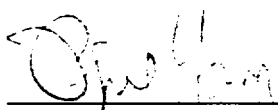
- Assume responsibility for implementing the Radiation Protection Program
- Ensure that radiation safety activities are being performed in accordance with our own approved procedures and all regulatory requirements.

Furthermore, in compliance with 10 CFR 35.24(e),(g), the executive management of this facility agrees to provide you as RSO:

- Specific written notation of your authority, duties and responsibilities, see attached.
- Sufficient authority, organizational freedom, time, resources and management prerogative to:
  1. Identify radiation safety problems;
  2. Initiate, recommend, or provide corrective actions;
  3. Stop unsafe operations; and,
  4. Verify implementation of corrective actions.

Our signatures noted below will attest to the issues noted above. Please make a copy of this document for your files and return the original to my attention.

Sincerely,

  
\_\_\_\_\_  
President

  
\_\_\_\_\_  
Radiation Safety Officer

January 2, 2008

UNITED STATES NUCLEAR REGULATORY COMMISSION  
Region III, Materials Licensing Section  
2443 Warrenville Road  
Suite 210  
Lisle, IL 60532-4352

- A. The amount of time that will be spent at Universal Imaging, Inc. will be on a quarterly basis unless additional time is required. This is an outpatient diagnostic nuclear medicine clinic that is limited to 35.100 and 35.200 usage only.
- B. The amount of time for me to respond to an emergency involving radioactive material will vary depending upon my activities that day. Typically I would be able to respond immediately by phone. All facilities have both my cell phone and office phone numbers. The office staff at Medical Physics Consultants, Inc. has a copy of my daily schedule at all times. The staff has phone numbers to any location that I might be working.

Medical Physics Consultants, Inc. has an answering service that operates 24 hours a day, 7 days a week, 365 days a year. They have phone numbers for my home, cell, and office. If for some reason they are not able to contact me, they have a list of other physicists that are employed by Medical Physics Consultants, Inc. to contact. Many of these individuals are board certified physicists with a great deal of expertise. This same mechanism has been in place for years whenever one of our facilities is in need of immediate expertise and advice. If we are contacted for a radiological emergency, we direct the account to notify the appropriate management individual.

- C. As a consultant at Medical Physics Consultants, Inc, I am given the flexibility in my schedule to address both my contractual and regulatory obligations to any facility that I am listed as the Radiation Safety Officer. Currently, I am contracted at 36 facilities and listed as the RSO at one facility.

The position of Radiation Safety Officer is what we are contracted for by these facilities. All facilities have a signed contract by both the facility and Medical Physics Consultants, Inc. These contracts clearly outline both my responsibilities and the facilities. All facilities have signed a RSO / Management Agreement form that is available for review by the NRC.

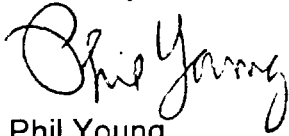
All facilities are audited on a quarterly basis which is the standard of practice. These audits are forwarded to both management and the supervising technologist. These audits are reviewed and signed by both of these individuals.

- D. There will be no adverse impact due to being the RSO at more than one facility because I am given the flexibility in my schedule to address both my contractual and regulatory obligations to any facility that I am listed as the Radiation Safety Officer.
- E. I have been a consultant employed by Medical Physics Consultants, Inc. for 7 years. I have many years of experience with respect to compliance with NRC regulations and facility inspections. Historically, I have been able to manage my time adequately to perform all job duties including duties as the Radiation Safety Officer.

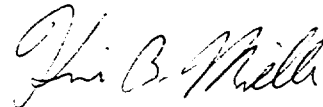
If you have any question or if I may be of assistance, please contact me by phone at (734)662-3197.

Thank you for your cooperation.

Sincerely,



Phil Young  
President  
Universal Imaging, Inc.



Kevin B. Miller, B.S  
Radiation Safety Officer  
Medical Physics Consultants



January 9, 2008

Phil Young  
President  
**UNIVERSAL IMAGING, INC.**  
1159 E. Michigan Ave.  
Ypsilanti, MI 48198

Dear Mr. Young:

Enclosed is the draft letter for the license amendment for changes to your NRC license. The following steps need to be taken to insure proper handling by the NRC.

1. Review carefully and be sure all information is correct. Retype the NRC cover letter and the RSO / Management Agreement Letter onto **Facility** letterhead.
2. Executive Management (VP or higher) must sign the cover letter, the RSO/Executive Management Agreement Letter, and NRC response letter.
3. Make two (2) copies.
4. ~~Mail~~ **two** of the signed copies to the following address: **Federal Express or U.P.S. is advised.**

**UNITED STATES NUCLEAR REGULATORY COMMISSION  
Region III  
Materials Licensing Branch  
2443 Warrenville Road Suite 210  
Lisle, IL 60532-4352**

5. File the original in the blue MPC book under license correspondence.
6. You will also need to apply for your State Registration. The following steps need to be taken to insure proper handling by the state.

### **State of Michigan**

1. Fax the signed forms to the fax number on the form. If you have not received this back within 2 weeks of faxing, please call the number on the form and ask them to fax it to you. The returned, stamped form should be filed in the blue MPC licensing book under State of Michigan.

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2309 Shelby Avenue  
Ann Arbor, MI 48103  
(734) 662-9224 Fax  
(734) 662-3197

70 E. 91st Street, Suite 106  
Indianapolis, IN 46240  
(317) 581-1931 Fax  
(317) 581-1911

4806 Mile High Drive  
Salt Lake City, UT 84124  
(801) 272-2952 Office & Fax

N7375 Crystal Ridge Drive  
Beaver Dam, WI 53916  
(920) 885-9872 Fax  
(920) 885-9870

Universal Imaging, Inc.  
January 9, 2008

Medical Physics Consultants, Inc.  
page 2

If you have any question regarding this mater or any other with which I can assist you, please call me at (734) 662-3197.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin B. Miller". The signature is written in a cursive style with a large, stylized initial "K".

Kevin B. Miller, B.S.  
Medical Physics Consultant

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**FedEx. US Airbill**  
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Recipient's Copy

1 From This portion can be removed for Recipient's records.  
Date 1-17-08 FedEx Tracking Number 857610918120-4

Sender's Name P Young Phone 734 755-1111

Company UNIVERSAL IMAGING INC XXAX

Address 1159 E MICHIGAN AVE Dept./Floor/Room

City YPSILANTI State MI ZIP 48198-5807

2 Your Internal Billing Reference

3 To Recipient's Name Region TL Phone

Company US Nuclear Regulatory Comm.

Recipient's Address Materials Licensing Dept./Floor/Room  
City Ann Arbor State MI ZIP 48106-0001

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6 Special Handling  
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7 Payment  
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 Third Party  
 Credit Card  
 Cash/Check

8 NEW Residential Delivery Signature Options  
 No Signature Required  
 Direct Signature  
 Indirect Signature

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