DIGIRAD
Leaders in Solid-State Imaging

Date January 25, 2008

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FAX

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FROM:	Traci Hollingshead
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RE:

REMARKS: ☐ *Urgent* ☒ *For your review* ☐ *Reply ASAP* ☐ *Please Comment*

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DIGIRAD®
Leaders in Solid-State Imaging

John D. Kinneman
Deputy Director
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415

By Facsimile and First Class Mail

Re: Supplemental Information to January 17, 2008
Enforcement Conference Presentation

Dear Mr. Kinneman:

During the January 17, 2008 Enforcement Conference, Digirad committed to providing written clarification regarding the manner in which it ensured control over licensed material at certain affected sites during the time period when memoranda of understanding ("MOUs") were in place regarding licensed material. These sites were specifically discussed at the enforcement conference.

As we explained at the enforcement conference, Digirad stored licensed material in a secured hot lab at each facility. In every case, when contracts were executed, Digirad made clear to the building owner or administrator who signed the MOU what specifications were needed for a hot lab. The hot lab specifications required were (i) a lockable closest or room (minimum of 4ft x 4ft) that would only be accessible by authorized personnel; (ii) would be used to house RAM unit doses, (iii) would be kept locked at all times, and (iv) would be posted with the following language: "caution radioactive material." Janitorial services and other similar support functions were not permitted access to the hot lab. Keys to the hot labs were limited to Digirad personnel, the radiopharmacy and either the building owner (if present) or the building administrator. In some cases, the physician was the building owner and therefore had a key or security code to the hot lab. In some cases, the building owner transferred the guardianship of the hot lab key or security to the physician in the clinical unit with the understanding of the above conditions.

The MOUs signed by the parties confirmed much of this understanding and practice. Pursuant to the MOUs, building management agreed and understood that RAM would be used in accordance with NRC and/or State regulations and would not present any danger if used in accordance with these requirements. Further, the MOUs confirmed access to RAM was by individuals authorized to use this material and, in the event of a dispute between Digirad and building management, preserved the right of Digirad to enter the facility and secure RAM.

Digirad's experience at these facilities demonstrates that RAM has always been secured. We experienced no issues with regard to hot lab security or access and our NRC inspection records have been equally unblemished.

Thank you for the opportunity to supplement the information that Digirad provided at the enforcement conference. Please call me at 605-231-0237 if you have any additional questions.

Sincerely,

Traci Hollingshead

Traci Hollingshead
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