



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

May 23, 2008

Docket No. 03037739
Control No. 142242

License No. 52-24907-02

Yocasta Brugal, M.D.
President/Dean of Medicine
San Juan Bautista School of Medicine
P.O. Box 4968
Caguas, PR 00762-4968

SUBJECT: SAN JUAN BAUTISTA SCHOOL OF MEDICINE, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR NEW LICENSE, CONTROL NO. 142242

Dear Dr. Brugal:

This is in reference to your application dated February 14, 2008 applying for a Nuclear Regulatory Commission license. In order to continue our review, we need the following additional information:

1. You have requested that Heriberto Torres, Ph.D. be named Radiation Safety Officer (RSO) on your license. It appears that this individual may be an outside consultant\contractor. If this is so, in support of this request, please address the following:
 - a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.
 - b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.
 - c. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).
 - d. Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.

- e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.
2. If you wish to have the flexibility of changing your radiation survey instrumentation without an amendment to your radioactive materials license, please provide the following statement in your response. "We reserve the right to upgrade our survey instruments as necessary as long as they are adequate to measure the type and level of radiation for which they are used."
3. In your application dated February 14, 2008, you stated that, "Equipment used to measure dosages will be calibrated in accordance with nationally recognized standards and the manufacturer's instructions." Please correct the statement to read as follows, "Equipment used to measure dosages will be calibrated in accordance with nationally recognized standards **or** the manufacturer's instructions."

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material; Regulations, Guidance, and Communications**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 142242. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5272.

For your information, a copy of this letter was e-mailed to Dr. Torres on May 23, 2008. If we do not receive a reply from you by June 9, 2008, we will assume that you do not wish to pursue your application.

Sincerely,

Original signed by Tara L. Weidner

Tara L. Weidner
Health Physicist
Medical Branch
Division of Nuclear Materials Safety

cc:
Heriberto Torres, Ph.D., Radiation Safety Officer

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SUNSI Review Complete: TWeidner

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