

KHULLAR MD & ASSOCIATES PLLC

5084 WEST PIERSON RD.
FLINT, MICHIGAN 48504

June 6, 2008

RSO / EXECUTIVE MANAGEMENT LETTER OF UNDERSTANDING

Subhash C. Khullar, M.D.
Radiation Safety Officer
Khullar, M.D. & Associates, P.L.L.C.
50 84 West Pierson Rd.
Flint, MI 48504

Re: Radiation Safety Officer / Executive Management
Letter of Understanding

Dear Dr. Khullar,

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.

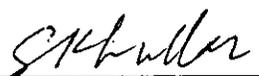
Furthermore, in compliance with 10 CFR 35.24(e),(g), the executive management of this facility agrees to provide you as RSO:

- 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.

The signature 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,

RECEIVED JUN 10 2008



Subhash C. Khullar, M.D.
Executive Management



Subhash C. Khullar, M.D.
Radiation Safety Officer

KHULLAR MD & ASSOCIATES PLLC

5084 WEST PIERSON RD.
FLINT, MICHIGAN 48504

June 6, 2008

United States Nuclear Regulatory Commission
Region III, Materials Licensing
2443 Warrenville Road, Ste. 210
Lisle, IL 60532-4352

RE: Expediency of new NRC License Khullar, M.D. & Associates, P.L.L.C.

Dear Sir/Madam:

We are asking to expedite this request, due to having all equipment in place. We need this NRC license to calibrate this equipment prior to patient use.

Item #1 Please find the enclosed diagram, license application, agreement letter, and NRC form 531 for:

***Khullar, M.D. & Associates, P.L.L.C.
5084 WEST PIERSON RD.
FLINT, MICHIGAN 48504***

Please note there will be no use of Xe-133 gas, I-131 or generators at this facility. All radioactive material will be kept in a secured area.

Please note that this facility is not a residence. There are no room numbers within the nuclear medicine department.

Upon receipt of license we will commence receipt and use of byproduct materials at this location. We are asking this be granted as soon as possible, thank you.

Dr. Khullar will also be the Radiation Safety Officer (RSO) at this facility. He is currently listed at 3 or 4 other sites as RSO. These are all part time accounts and he will have no problem with his duties and responsibilities at any locations listing him as RSO. Please find the agreement letter to this enclosed.

If you have any questions or require additional information, please contact our physics consultant, Laura Luna at 734-662-3197.

Sincerely,



Dr. Subhash C. Khullar, M.D.

NRC FORM 313
(4-2008)
10 CFR 30, 32, 33,
34, 35, 36, 39, and 40

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 10/31/2008

Estimated burden per response to comply with this mandatory collection request: 4.4 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollect@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

APPLICATION FOR MATERIALS LICENSE

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
612 E. LAMAR BOULEVARD, SUITE 400
ARLINGTON, TX 76011-4125

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- A. NEW LICENSE
 B. AMENDMENT TO LICENSE NUMBER _____
 C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (include ZIP code)

Subhash C. Khullar, M.D.
38800 Ryan Rd.
Sterling Heights, MI 48312

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

Khullar, M.D. & Associates, P.L.L.C.
5084 West Pierson Rd.
Flint, MI 48504

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Laura M. Luna, Consultant

TELEPHONE NUMBER

(734) 662-3197

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY AMOUNT ENCLOSED \$ 3,900.00

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 748 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

Subhash C. Khullar, M.D.

SIGNATURE

Subhash C. Khullar

DATE

6/5/08

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

Applicability Table

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RADIOACTIVE MATERIAL

8.5 Item 5

Byproduct Material

Chemical/Physical Form Purpose Amount

Material in 35.100

Any

As Needed(excluding Xe-133)
limited to cardiovascular clinical
procedures

Material in 35.200

Any

As Needed(excluding Xe-133)
limited to cardiovascular clinical
procedures

**RADIOACTIVE MATERIAL – RECORDKEEPING FOR DECOMMISSIONING AND
FINANCIAL ASSURANCE**

8.7 Item 5

No Response is Required

RADIOACTIVE MATERIAL USAGE

8.8 Item 6

Material in 35.100

Medical use of Unsealed Byproduct Material for Uptake, dilution,
and excretion studies for which a written directive is not required

Material in 35.200

Medical use of Unsealed Byproduct Material for Imaging and
localization studies for which a written directive is not required
(excluding Xe-133) limited to cardiovascular clinical procedures

RADIATION SAFETY PROGRAM RESPONSIBILITY

8.10 Item 7

Radiation Safety Officer

Subhash C. Khullar, M.D.

8.11 Item 7

Authorized Users

Materials

Subhash C. Khullar, M.D..

35.100, and 35.200
(excluding Xe-133) limited to
cardiovascular clinical procedures

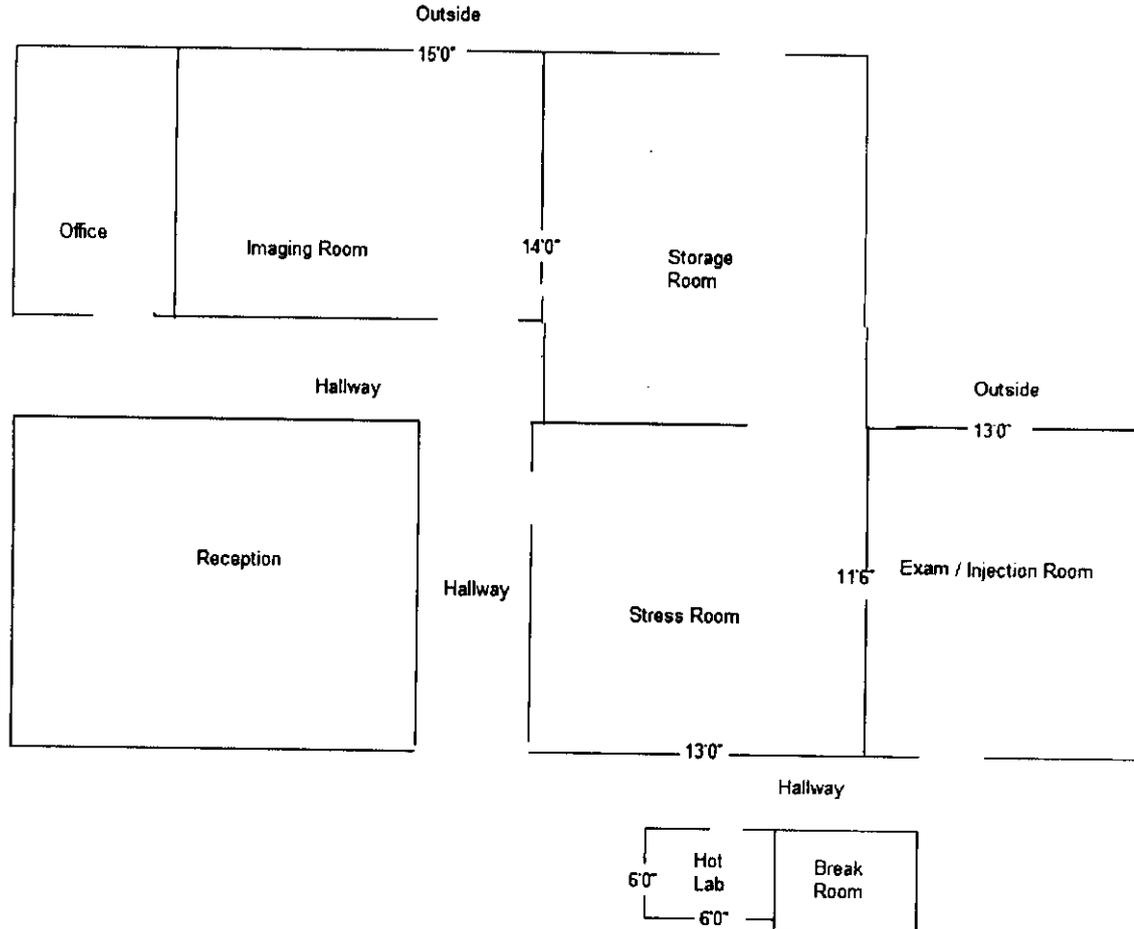
All named users and RSO are currently authorized on existing NRC licenses.

FACILITIES AND EQUIPMENT

FACILITY DIAGRAM

8.15 Item 9

Khullar, M.D. & Associates Nuclear Medicine Department



Directly below the facility is a cement slab.
Directly above the facility is the roof.
Hot lab will be secured by lock and key.
There are no room/suite numbers in this department.

RADIATION MONITORING INSTRUMENTS

8.16 Item 9

We have developed and will implement and maintain written survey meter calibration procedures in accordance with the requirements in 10 CFR 20.1501 and that meet the requirements of 10 CFR 35.61.

**DOSE CALIBRATOR AND OTHER EQUIPMENT USED TO MEASURE DOSAGES OF
UNSEALED BYPRODUCT MATERIAL**

8.17 Item 9

Equipment used to measure dosages will be calibrated in accordance with nationally recognized standards or the manufacturer's instructions.

RADIATION PROTECTION PROGRAM

OCCUPATIONAL DOSE

8.22 Item 10

Either we will perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10CFR Part 20 or we will provide dosimetry that meets the Criteria in the section entitled "Radiation Safety Program – Occupational Dose" in NUREG-1556 Vol 5.

AREA SURVEYS

8.23 Item 10

We have developed and will implement and maintain written procedures for area surveys in accordance with 10 CFR 20.1101 that meet the requirements of 10 CFR 20.1501 and 10 CFR 35.70.

SAFE USE OF UNSEALED LICENSED MATERIAL

8.24 Item 10

We have developed and will implement and maintain procedures for safe use of unsealed byproduct material that meet the requirements of 10 CFR 20.1101 and 10 CFR 20.1301.

SPILL PROCEDURES

8.25 Item 10

We have developed and will implement and maintain written procedures for safe response to spills of licensed material in accordance with 10 CFR 20.1101

MINIMIZATION OF CONTAMINATION

8.27 Item 10

A response is not necessary but make sure before shipping this out!!!!

WASTE MANAGEMENT

8.28 Item 11

We have developed and will implement and maintain written waste disposal procedures for licensed material in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of Subpart K to 10 CFR Part 20 and 10 CFR 35.92.



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