



ESCUELA DE MEDICINA
San Juan Bautista

June 4, 2008

US Nuclear Regulatory Commission
Licensing Assistant Team
Division of Nuclear Material Safety
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Subject: San Juan Bautista School of Medicine
Request for additional information
Control No. 142242

ATT: Tara L. Weidner
Medical Branch

This letter is in reply to your request for additional information concerning our license application.

- 1- In relation to the appointment of Heriberto Torres, Ph.D. as Radiation Safety Officer, he will be an outside consultant – RSO. The requested information is as follows:
- a. Enclosed please find Delegation of Authority and Appointment of RSO. This document contains the duties of the RSO concerning radiation safety problems that require implementation of corrective actions and the authorization delegated by our Institution to be in charge of the radiation safety program.
 - b. The RSO will have the necessary relationship with the management (Executive Director and the School Dean) for the expenditure of funds, when necessary, to facilitate the objectives of the radiation safety program.
 - c. As for as we know, Dr. Torres is consultant RSO for the PET License no. 52-31059-01 for Modern Radiology, Ponce, PR and Hima San Pablo, license no. 52-25621-01 in Fajardo, PR. As specified in Delegation Authority, the RSO will dedicate one hour per week visit to our facilities.
 - d. As you require, Mr. Samuel Rodríguez, RT will be appointed as an in-house representative who will serve as the point of contact during the RSO's absence. Mr. Rodríguez is the radiology technology supervisor who is always available at the Department. He is acquainted with all the activities of the nuclear medicine program.

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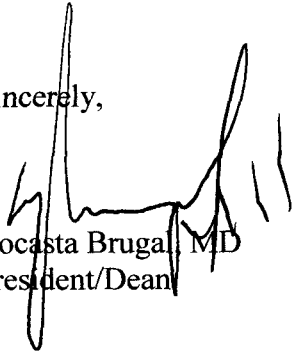
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REGION I

e. Dr. Torres has been consultant for our school during the planning of the nuclear medicine program, including PET. He will always be available whenever needed to respond to questions or operational issues concerning the radiation safety program either traveling to our site and/or via telephone and e-mail. Dr. Torres's office is located in San Juan and it will take about twenty (20) minutes to arrive at our facilities in the event of an emergency.

2- The following statement is provided: "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- The corrected statement is provided as follows: "Equipment used to measure dosages will be calibrated in accordance with nationally recognized standards or the manufacturer's instructions."

Sincerely,



Yocasta Brugal, MD
President/Dean

San Juan Bautista School of Medicine
Caguas, Puerto Rico

Delegation of Authority

Memo to: Radiation Safety Officer
From: Executive Director
Subject: Delegation of Authority

You, Heriberto Torres, Ph.D., have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the radiation protection program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations where justified by radiation safety. You are required to notify management if staff do not cooperate and do not address radiation safety issues. In addition, you are free to raise issues with the Nuclear Regulatory Commission at any time. It is estimated that you will spend 1 hour per week conducting radiation protection activities.

I accept the above responsibilities.



Signature of Management Representative

June 4, 2008

Date



Signature of Radiation Safety Officer

June 4, 2008

Date