



PAPASTAVROS' ASSOCIATES

MEDICAL IMAGING L.L.C.

2008 JUL -3 AM 10:30

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June 30, 2008

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Mr. Richard McKinley, Health Physicist
U.S. Nuclear Regulatory Commission
Region I, Licensing Assistance Team
475 Allendale Road
King of Prussia, PA 19406

03011379

RE: NRC Radioactive Material License No. ~~07-16519-01~~; Mail Control No. **142297**

07-16529-01 RLJ

Dear Mr. McKinley,

This letter is in response to your letter of June 4, 2008, in which you requested additional information regarding our letter to you dated April 4, 2008. Additionally, we sent a letter to you dated May 22, 2008, in which we further described the nuclear medicine department facility changes which have occurred at our 1701 Augustine Cut-Off site. As appropriate, we will refer to both letters (April and May) as we respond to those inquiries in the order of presentation.

1. The authorized users involved with our byproduct material and NARM program are currently approved and listed on our current radioactive material license.
2. a. On March 14, 1008, Radiology Associates, Inc. (d/b/a Papastavros Associates) sold its assets to Delaware Imaging Partners, Inc. a wholly owned subsidiary of RadNet Management, Inc. Radiology Associates, Inc. was the entity which conducted the technical operations for Papastavros'. It employed all of the administrative and technical personnel and owned all of the physical assets used in the provision of services. Papastavros' Associates Medical Imaging, L.L.C. (PAMI) is an on-going entity that employs the radiologists and provides the professional component or services. Radiology Associates Inc. previously had an agreement with PAMI to provide the technical services. Subsequent to the asset sale, Delaware Imaging Partners, Inc. entered into a management agreement with PAMI to provide the same type of technical services that Radiology Associates, Inc. previously provided. PAMI, as a legal entity, has not changed. Radiology Associates Inc. simply sold its assets and transferred its employees to Delaware Imaging Partners,

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Inc. who now conducts substantially the same operations that Radiology Associates Inc. conducted previously.

- b. Papastavros' Associates Medical Imaging, L.L.C., the license owner, has not changed ownership and will continue to hold the license.
 - c. There have been no changes in authorized users, Radiation Safety Officer (Dr. Garth Koniver), or nuclear medicine technologists associated with this radioactive material license.
 - d. As described in our May letter, the area adjacent to the former nuclear medicine area was renovated so that it would become a new, expanded section of the nuclear medicine department, Section A. A new ADAC dual head gamma camera was installed there and was clinically operational the week of May 19, 2008. However, the plans to install (following decommissioning area, surveys and wipe tests) a permanent PET-CT unit in that former nuclear medicine department area, Section B, were abandoned by us last week after careful consideration of radiation shielding requirements and adjacent occupancies. Hence, we no longer request an amendment to our license to add the Germanium-68 sealed (calibration) sources. We will request this amendment in the future if our plan to install a permanent PET-CT scanner in another one of our facilities comes to fruition. The area previously designated for the PET-CT unit will, most likely, be renovated to house a new CT scanner.
 - e. The surveillance program regarding area surveys, wipe tests, and quality control is the same now as it was prior to the involvement of RadNet Management, Inc. and the ensuing nuclear medicine department facility changes. Current equipment continues to be used to assure proper use, possession, storage, waste disposal, accurate patient dosage administration, and wipe test quantification.
 - f. Please refer to our May letter enclosures for the decommissioning area survey and wipe test results of the former nuclear medicine department area, which indicated that the area was free of radioactivity prior to its unrestricted release.
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g. We acknowledge that the current management will continue to abide by all the constraints, conditions, requirements and commitments of the existing radioactive materials program.

We hope that you will contact us shortly to clarify any questions you may have regarding this information. Feel free to call Ms. Donna Grace, Operations Manager at (302) 652-3016 (Ext. 3032).

Thank you for your attention to this matter.

Sincerely yours,

Garth A. Koniver, M.D.
Radiation Safety Officer,
Papastavros' Associates Medical Imaging, L.L.C.

Vickie Bedel, R.T.(R) CT,
National Director of Operations,
RadNet, Inc.