



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

September 12, 2008

Docket No. 03017845
Control No. 142740

License No. 52-19547-01

José A. Torres-Ruiz, Ph.D.
Associate Dean for Research and Graduate Studies
Ponce School of Medicine
P. O. Box 7004
Ponce, PR 00732-7004

**SUBJECT: PONCE SCHOOL OF MEDICINE, REQUEST FOR ADDITIONAL
INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO
LICENSE, CONTROL NO. 142740**

Dear Dr. Torres-Ruiz:

This is in reference to your letter dated August 11, 2008 requesting to amend Nuclear Regulatory Commission License No. 52-19547-01. In order to continue our review, we need the following additional information:

1. In your application, you identify Mr. Daniel Torres as your proposed Radiation Safety Officer.
 - a. Please describe this individual's formal training in the following areas: (1) the principles and practices of radiation protection; (2) radioactivity measurements standardization and monitoring techniques and instruments; (3) mathematics and calculations basic to the use and measurement of radioactivity; and (4) the biological effects of radiation.
 - b. Please describe the specific radionuclides the individual has handled, the maximum quantities of materials handled, where the experience was gained, the duration of the experience, and the type of use.
2. Your license currently authorizes a range of radionuclides in Item 6/7/8 F, "any byproduct material with atomic numbers 3 through 83, inclusive"; in "any" form; with a maximum amount that is listed as "See Condition No. 18." However, we are currently required to list specific amounts in Item 8.F. In addition, because Condition No. 18 is limited in order that financial assurance is not required, Condition No. 18 also must refer to any other radionuclides specifically listed on your license with a half-life of greater than 120 days (Item 6/7/8.A, carbon-14 and Item 6/7/8.C, hydrogen-3). Also, this condition as written applies only to licenses of broad scope Type C, pursuant to 10 CFR Part 33. If you wish to continue to be authorized for this range of radionuclides,
 - a. Specify the amount of material with atomic numbers 3 through 83 that you wish to possess per radionuclide and the total possession limit. In the past, you were authorized to possess 500 microcuries per radionuclide but did not have a total

possession limit.

- b. The following condition will replace Condition No. 18 on your license: “In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d) for establishing decommissioning financial assurance.” Confirm that you understand that
 - i. this condition is applicable to all licensed materials with half-lives greater than 120 days possessed under this license;
 - ii. in accordance with 10 CFR 30.35(a), the “unity rule” applies when more than one radionuclide is possessed; and
 - iii. you will maintain records that demonstrate you never possess, at any one time, amounts of radionuclides for which financial assurance is required.

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 1-888-293-6498. 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. 142740. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5040.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Sincerely,

Original signed by Elizabeth Ullrich

Betsy Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

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