

## Cataract & Vision Center of Hawaii

Worldster Lee, M.D., Candace Furubayashi, M.D.

1712 Liliha Street Suite 400 Honolulu, H1 96817 457-4113 457-4159 FAX: 585-0369

September 22, 2008

Roberto J. Torres U.S. Nuclear Regulatory Commission, Region IV Nuclear Materials Safety, Branch B 612 E. Lamar Blvd, Suite 400 Arlington, TX 76011-4125



Subject:

New License Application for Cataract and Vision Center of Hawaii

Docket #030-37793 (53-29305-01)

Dear Mr. Torres:

We have received the recently published Licensing Guidance for the Intraocular Use of Neovista, Inc.'s Epi-Rad (Strontium-90) Ophthalmic System. We commit to implementing this guidance.

In addition, we request that you incorporate a change process into our license, which would allow us to make future changes to the radiation safety program without requesting a license amendment. Such changes would be allowed if the following conditions were met:

the revision is in compliance with the regulations; and

 the revision is based on NRC's current licensing guidance for the NeoVista Epi-Rad System, pursuant to 10 CFR 35.1000 use, as posted on the NRC web site; and

 the revision has been reviewed and approved by the radiation safety officer and management; and

 the affected individuals are instructed on the revised program before the change is implemented; and

the record of each change is retained for five years; and

the record will include a copy of the appropriate Web site guidance, the old
procedure, the new procedure, the effective date of the change, and the
signature of the management representative that reviewed and approved the
change.

If you require additional information, please contact our Radiation Safety Officer, Ronald Frick, at 808-373-7009.

Sincerely,

Worldster Lee, M.D. Medical Director

Cataract and Vision Center of Hawaii

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