

# PETNET Solutions

February 17, 2010

Mr. Kevin Null  
US Nuclear Regulatory Commission  
Region III  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

**Re: Reply to comments from February 4, 2010 phone conversation  
PETNET Solutions Facility in Indianapolis, IN  
Radiopharmacy and Production License Applications**

Dear Mr. Null:

As per our phone conversation of February 4, 2010, we provide the following information and comments.

As to the application and minor address issues, we provide an updated Form 313 with the minor change we discussed. Please see attached.

On the topic of Ancillary workers, PETNET commits to providing initial training to such personnel before they can work in the restricted area. We will provide updates to that training if there are any changes to the information provided. Ancillary workers will always work under the direct supervision of a trained PETNET employee.

In both the Production and Radiopharmacy applications we had the following statement concerning instrument calibration:

Instruments and equipment used for quantitative radiation measurements (other than dose calibrators) will be calibrated:

1. by a person licensed or registered by the Department, another agreement state, a licensing state, or the NRC;

The use of the term Department is a mistake. It was meant to mean Commission, as in NRC. We also point out that besides dose calibrators, the NaI well counter connected to the single channel analyzer for wipe and other counting is calibrated in house on a quarterly basis.

As we discussed, PETNET does not intend at this time to take back used syringes from customers. We understand that if we decide to utilize this waste return procedure that we would need to amend our license to authorize this activity.

Finally, you commented that the provision for calibration sources in 10 CFR 35.65 do not apply to a Part 32 Licensee. Therefore, we are providing specifics on the non-exempt sealed sources that are needed to calibrate and test instrumentation.

PETNET Solutions, Inc.  
A Siemens Company

810 Innovation Drive  
Knoxville, TN 37932

Tel: (800) 738-0488  
Fax: (865) 218-3018

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<b>Nuclide</b>	<b>Form</b>	<b>Maximum Possession</b>
Na-22	Sealed Source, IPL Model RV-022, e-vial	250 $\mu$ Ci per source, 1 mCi total
Co-57	Sealed Source, IPL Model RV-057-5M or Radqual Model BM06, e-vial	6 mCi per source, 10 mCi total
Ge-68	Sealed Source, IPL Model GF-068-D or SM-068, disk source	15 $\mu$ Ci per source, 50 $\mu$ Ci total
Cs-137	Sealed Source, IPL Model RV-137-200U or Radqual Model BM06E-37	250 $\mu$ Ci per source, 1 mCi total

We believe that this is responsive to your questions. If you have questions, please contact me at the numbers listed below.

Sincerely,

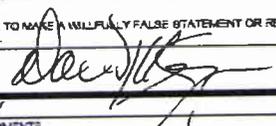


David J. Krueger, CHP  
Corporate Radiation Safety Officer  
PETNET Solutions, Inc.  
Voice: 818-620-6569  
Fax : 865-218-3018  
david.j.krueger@siemens.com

att: Radioactive Materials License Application, Form 313 Revised

cc: James Kauchak, Facility Manager/RSO

# Radioactive Materials License Application

<b>NRC FORM 313</b> U.S. NUCLEAR REGULATORY COMMISSION <small>(4-2008)                  10 CFR 30.32, 33,                  34, 35, 36, 39, and 40</small>		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 Service Branch (T-5 FS3), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to <a href="mailto:infocollections@nrc.gov">infocollections@nrc.gov</a> , and to the Desk Officer, Office of Information and Regulatory Affairs, N209-1022E, (3155-0122), 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.			
<b>APPLICATION FOR MATERIALS LICENSE</b>					
<b>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.</b>					
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 BY:  ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:  MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION II 3443 WARRENVILLE ROAD, SUITE 210 U/LE IL 60532-4352  ALABAMA, 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 JURISDICTION.					
1. THIS IS AN APPLICATION FOR (Check appropriate item) <input checked="" type="checkbox"/> A. NEW LICENSE <input type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER _____ <input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER _____		2. NAME AND MAILING ADDRESS OF APPLICANT (include ZIP code)  PETNET Solutions, Inc. 810 Innovation Drive Knoxville TN 37932			
3. ADDRESS (WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED)  1345 West 16th Street  Indianapolis, IN 46202		4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION  David J. Krueger, CHP  TELEPHONE NUMBER  (818) 620-6569			
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. INDIVIDUALS 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 3C. AMOUNT ENCLOSED \$ 7,400.00			
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 (52 STAT. 749) 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 - TYPE PRINTED NAME AND TITLE David J. Krueger, Corporate RSO		SIGNATURE 	DATE 09/04/2009		
<b>FOR NRC USE ONLY</b>					
TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
APPROVED BY			\$		
				DATE	

NRC FORM 313 (4-2008)

PRINTED ON RECYCLED PAPER

**UPS CampusShip: View/Print Label**

1. **Print the label(s):** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS Customers without a Daily Pickup**
  - Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.
  - Hand the package to any UPS driver in your area.
  - Take your package to any location of The UPS Store<sup>®</sup>, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot<sup>®</sup> or Staples<sup>®</sup>) or Authorized Shipping Outlet near you. Items sent via UPS Return Services<sup>SM</sup> (including via Ground) are also accepted at Drop Boxes.
  - To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

**Customers with a Daily Pickup**

- Your driver will pickup your shipment(s) as usual.

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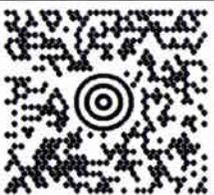
CHRISTI ELAM  
865-218-2235  
PETNET SOLUTIONS, INC  
810 INNOVATION DRIVE  
KNOXVILLE TN 37932

0.0 LBS LTR

1 OF 1

**SHIP TO:**

KEVIN NULL  
(630) 829-9854  
NRC  
2443 WARRENVILLE RD, SUITE 210  
REGION III  
US NUCLEAR REGULATORY COMMISSION  
LISLE IL 60532-4352

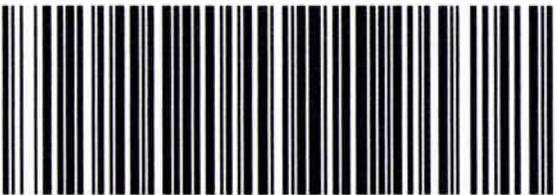


IL 603 9-03



**UPS NEXT DAY AIR SAVER 1P**

TRACKING #: 1Z 3V7 23W 13 9115 4364



BILLING: P/P

Company/Cost Center: 011-7415  
Business: Business

CS 12 0 23 WXP1E60 99 0A 01/2010



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