



MIDWEST IMAGING CONSULTANTS

1205 DeKalb Ave.

Sycamore, IL 60178

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July 28, 2010

Geoff Warren
Division of Nuclear Material Safety
ATTN: Reciprocity Request
US, NRC, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

LETTER OF CORRECTIVE ACTION

Mr. Warren,

Per our conversation, the purpose of this letter is to demonstrate our corrective actions concerning reciprocity licensing approval at our temporary service facilities in Indiana.

Effective immediately:

- 1) A copy of NRC Form 241 reciprocity rules and regulations (attached) along with our consultant Ashwin Patel's memo (attached) will be distributed to all Nuclear Technologists, Supervisors, Managers and Sales Personnel.
ACTION TAKEN ON July 29, 2010
- 2) A section covering NRC Form 241 explaining the rules and regulations of reciprocity will be included in the Nuclear Medicine Technologist Orientation and Training Check List (See Attached)
ACTION TAKEN ON July 29, 2010
- 3) Midwest Imaging Consultants provides annual training for all of our Technologists and we will provide additional training that covers NRC Form 241 reciprocity rules and regulations.
ACTION TAKEN ON AN ANNUAL BASIS DURING TECHNOLOGIST TRAINING

I hope the information submitted is satisfactory. Should you have any questions, please do not hesitate to contact me on my cell phone (815) 757-5056

Sincerely,

Jim Doran,
President/RSO



MEMORANDUM

July 27, 2010

To: Mr. Jim Doran
Radiation Safety Officer
Medical Imaging Consultants (MIC)
1205 DeKalb Ave
Sycamore, IL 60178

From: Ashwin Patel
Health Physics Consultant

Reference: NRC - Reciprocity License

Please note that, to comply with the NRC Reciprocity License conditions, the Midwest reciprocity license must be amended **before** the Nuclear Medicine service is started at a new client facility in Indiana.

The amendment **MUST** be submitted to the NRC for any new business in a non-agreement state and it **MUST** include the new facility name and address prior to beginning service and only after NRC approval.

I would also recommend that you distribute a copy of NRC Form 241 to all of your Nuclear Techs, supervisors, managers and sales personnel.

Should you have any questions, please do not hesitate to contact me.

*Ashwin Patel,
Health Physics Consultant*

U.S. NUCLEAR REGULATORY COMMISSION

**REPORT OF PROPOSED ACTIVITIES IN NON-AGREEMENT STATES, AREAS OF
EXCLUSIVE FEDERAL JURISDICTION, OR OFFSHORE WATERS**

PLEASE READ THIS INFORMATION AND THESE INSTRUCTIONS BEFORE COMPLETING NRC FORM 241

Section 150.20 of 10 CFR 150 establishes a general license authorizing any person who holds a specific license from an "Agreement State" (a State with which the U.S. Nuclear Regulatory Commission has entered into an effective agreement under subsection 274b of the Atomic Energy Act of 1954) where the licensee maintains an office for directing the licensed activity and at which radiation safety records are normally maintained, to conduct the same activity in Non-Agreement States, areas of exclusive Federal jurisdiction, or in offshore waters if the specific license issued by the Agreement State does not limit the authorized activity to specified locations or installations.

INSTRUCTIONS

Licensees cannot perform work in areas of exclusive Federal jurisdiction without either (a) filing NRC Form 241 for reciprocity in accordance with 10 CFR 150.20(b) or (b) applying for a specific NRC license. An area of exclusive Federal jurisdiction is an area over which the Federal government exercises legal control without interference from the jurisdiction and administration of State law. For example: If the work is to be performed on Federal property in an Agreement State, the licensee must first determine the jurisdictional status of the area where the licensee plans to work. If the jurisdictional status of the work site is unknown to the licensee, the Agreement State licensee should contact the Federal agency that controls the facility where the work is to be performed. A written statement concerning the jurisdictional status is not required in order to file for reciprocity; however, it is recommended that the Agreement State licensee obtain such a statement for the file for future reference and inspection purposes.

For licensees seeking to conduct activities under reciprocity for the first time in a calendar year, submit this Form, one copy of the Agreement State specific license and the fee specified in fee Category 16, 10 CFR 170.31. NRC must receive this filing at least 3 days before the licensee engages in activities permitted under the General License established by Section 150.20 of 10 CFR 150.

In general, the preferred method of filing is through the facsimile transmission of NRC Form 241, a copy of the Agreement State license, and evidence that the appropriate fee requirements will be met within 3 days. This evidence can be a copy of the check or a copy of NRC Form 629, if paying by credit card, that will be mailed to the NRC. The licensee should receive confirmation (by telephone, e-mail, or facsimile) that NRC has received the facsimile. Alternatively, the licensee may file the required information through the mail or other means as long as NRC receives the information at least 3 days before the licensee engages in the activity.

In completing NRC Form 241, it is important that the information submitted on NRC Form 241 be specific regarding the location and date of use as well as the activity requested. If it is not possible to provide complete information, such as addresses for the locations of work, the licensee should provide as much information as possible. The licensee is responsible for providing additional information as revisions or clarifications as soon as such information becomes available.

Item 2.

For licensees seeking to conduct activities under reciprocity for the first time in a calendar year, submit this Form, one copy of the Agreement State specific license and the fee specified in fee Category 16, 10 CFR 170.31. NRC must receive this filing at least 3 days before the licensee engages in activities permitted under the General License established by Section 150.20 of 10 CFR 150. The licensee should check the "initial" box if this is the first submission of Form 241 for the year.

For modifications such to the information submitted on the initial NRC Form 241, such as additional work locations, changes to radioactive material, work activities, information that clarifies or deletes specific locations or work sites, modifies work site contacts, or adds or deletes dates of work, licensees should file by NRC Form 241 or letter, so that NRC receives the filing at least 3 days prior to engage in such activity. Licensees should check the "change" box to indicate changes to the information provided on the initial NRC Form 241. It is not necessary to resubmit the Agreement State license unless the license has been amended since the filing of the initial NRC Form 241. No fee is required for changes.

NRC Form 241 may be used for submitting multiple work locations and clients for initial filings of NRC Form 241, as well as for submitting revisions and clarifications to previous filings. Separate sheets may be used provided it includes all of the requested information in Items 9-16 of NRC Form 241.

Under the general license, reciprocity activities are authorized only as long as the licensee holds a valid radioactive material license. If the license expires during the year, an extension letter or a renewed license issued by the regulating agency must be submitted to NRC before performing any additional work under reciprocity.

Items 12. - 16.

Under the general license, reciprocity activities, including storage (usage), conducted in non-Agreement States and areas of exclusive Federal jurisdiction, are limited to a total of 180 days in any calendar year except for work conducted in off-shore waters, which is authorized for an unlimited period of time in a calendar year. NRC tracks reciprocity usage on the basis of approved usage days. NRC will not approve any activity under the general license which causes the total usage days to exceed 180 days, except for work conducted in off-shore waters. NRC may note and notify the licensee that a filing proposes reciprocity activities which approach or would exceed the 180-day limit. It is important that licensees track the days of use and clarify or delete dates of work when applicable.

Item 12. should reference the proposed beginning and ending dates of work for each work location with the total number of days worked recorded in Item 13. Item 14. should be completed to show additional work dates different from those provided on the initial NRC Form 241 and Item 15. should indicate dates when work was not performed, as initially requested, that need to be deleted from the total work days. The Location Reference Number in Item 16. is generated by the NRC for use in tracking reciprocity activities and is specific for each work location. The Location Reference Number should be referenced for any revisions or clarifications to work location information.

Item 18 Licensees should identify the specific make and model numbers of sealed sources and devices.

NOTE: Inspections by NRC of activities performed in non-Agreement States, areas of exclusive Federal jurisdiction, or offshore waters by Agreement State licensees operating under the general license in 10 C FR 150.20 will be conducted at the listed work site location(s). Failure to file an NRC Form 241 may result in the issuance of a notice of violation, the proposed imposition of a civil penalty, or an order suspending, modifying, or revoking the license as specified in the "General Statement of Policy and Procedures for NRC Enforcement Actions."

Agreement State licensees seeking to conduct activities under Reciprocity should file this Form, one copy of the Agreement State license, and the appropriate fee with the U.S. Nuclear Regulatory Commission Regional Administrator listed below for the region in which the Agreement State that issued the specific license is located:

IF THE AGREEMENT STATE LICENSE IS ISSUED BY:

Alabama, Florida, Georgia, Kentucky, Maine, Maryland, Massachusetts, Mississippi, New Hampshire, New York, North Carolina, Rhode Island, South Carolina, or Tennessee,

SEND APPLICATION AND FEE PAYMENT TO:

Regional Administrator
Division of Nuclear Material Safety
ATTN: Reciprocity Request
Nuclear Materials Safety Branch
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415
Telephone Number (800) 432-1156
Facsimile Number (610) 337-5393

IF THE AGREEMENT STATE LICENSE IS ISSUED BY:

Illinois, Iowa, Ohio, or Wisconsin,

SEND APPLICATION AND FEE PAYMENT TO:

Regional Administrator
Division of Nuclear Material Safety
ATTN: Reciprocity Request
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352
Telephone Number (630) 829-9887
Facsimile Number (630) 515-1259

IF THE AGREEMENT STATE LICENSE IS ISSUED BY:

Arizona, Arkansas, California, Colorado, Idaho, Kansas, Louisiana, Nebraska, Nevada, New Mexico, North Dakota, Oregon, Texas, Utah, or Washington,

SEND APPLICATION AND FEE PAYMENT TO:

Regional Administrator
Division of Nuclear Material Safety
ATTN: Reciprocity Request
U.S. Nuclear Regulatory Commission, Region IV
612 E. Lamar Boulevard, Suite 400
Arlington, TX 76011-4125
Telephone Number (817) 860-8100
Facsimile Number (817) 860-8263

150.20 Recognition of Agreement State Licensees

(a)(1) Provided that the provisions of paragraph (b) of this section have been met, any person who holds a specific license from an Agreement State, where the licensee maintains an office for directing the licensed activity and retaining radiation safety records, is granted a general license to conduct the same activity in (i) Non-Agreement States; (ii) Areas of exclusive Federal jurisdiction within Agreement States; and (iii) Offshore waters.

(2) The provisions of paragraph (a)(1) of this section do not apply if the specific Agreement State license limits the authorized activity to a specific installation or location.

(b) Notwithstanding any provision to the contrary in any specific license issued by an Agreement State to a person engaging in activities in a non-Agreement State, in an area of exclusive Federal jurisdiction within an Agreement State, or in offshore waters under the general licenses provided in this section, the general licenses provided in this section are subject to all the provisions of the Act, now or hereafter in effect, and to all applicable rules, regulations, and orders of the Commission including the provisions of §§ 30.7 (a) through (f), 30.9, 30.10, 30.14(d), 30.34, 30.41, and 30.51 to 30.63, inclusive, of part 30 of this chapter; §§ 40.7 (a) through (f), 40.9, 40.10, 40.41, 40.51, 40.61, 40.63 inclusive, 40.71 and 40.81 of part 40 of this chapter; §§ 70.7 (a) through (f), 70.9, 70.10, 70.32, 70.42, 70.52, 70.55, 70.56, 70.60 to 70.62 of part 70 of this chapter; §§ 74.11, 74.15, and 74.19 of part 74 of this chapter; and to the provisions of 10 CFR parts 19, 20 and 71 and subparts C through H of part 34, §§ 39.15 and 39.31 through 39.77, inclusive, of part 39 of this chapter. In addition, any person engaging in activities in non-Agreement States, in areas of exclusive Federal jurisdiction within Agreement States, or in offshore waters under the general licenses provided in this section:

Nuclear Medicine Department Technologist Orientation Check List

The following items were reviewed with the Nuclear Medicine Technologist.

Name: _____

“X” - Yes “N/A” – Not Applicable

YES	ITEM
	Radioactive Material License, application and correspondence
	Regulations
	ALARA Program
	Prenatal Radiation Exposure instructions (NRC Regulatory Guide 8.13)
	Nuclear Medicine Policy and Procedures manual
	Nuclear Medicine Department Posting requirement
	Nuclear Medicine Department Record Keeping Requirements
	Radioactive Package Receiving, Opening, Handling
	Regulatory guides and notices (if any)
	Diagnostic Radiopharmaceutical Reportable and Recordable Policy
	Radiopharmaceutical Administration Authorization (Dosage Ranges)
	Proper use of Department survey meters: check source reading
	Proper use of wipe sample analyzer: check source reading; cpm to dpm conversion
	Dose Calibrator checks: constancy, linearity, accuracy and geometrical variation
	Radioactive Waste Disposal
	Surveys and Wipe Tests – Analysis of the wipe samples
	Preparing radioactive packages for shipment
	Transportation of Radioactive Material
	I-131 Therapy – Outpatient – QM Program
	I-131 Therapy – In Patient – QM Program
	Xe-133: use, safety precautions, ventilation, exhaust, trap checks
	NRC FORM 241 Reciprocity Rules and Regulations
	Record Keeping Requirements

This is to verify that _____ has had the opportunity to review and is trained in the above described items.

By: _____ Date: _____

RSO: _____ Date: _____