

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

JUL 20 2011



Brian Kennedy, Ph.D.
Radiation Safety Officer
Indiana University School of Medicine – Northwest
3400 Broadway
Gary, IN 46408

Dear Dr. Kennedy:

Enclosed is Amendment No. 21 renewing your NRC Material License No. 13-18384-01 in accordance with your request. Please note that the major changes made to your license are printed in **bold** font.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

This amendment renews your license for a ten year period and your license will not expire until July 31, 2021.

This also refers to the telephone discussion between Roman Dziarski, Ph.D. and me on July 20, 2011. I called Dr. Dziarski for several reasons: the telephone number we have on file for you was not working and I needed to know how to reach you and I had concerns that there might be some confusion on the type of NRC license you have and what your license requires with respect to having a Radiation Safety Committee (RSC).

Dr. Dziarski gave me your new phone number and I clarified for him that, since your license is not a broad scope license, but a limited scope license, you are not required to have an RSC. You “may” have an RSC on your own, but NRC does not “require” you to have one and information about your RSC should not be included in the license application.

Other licenses in the Indiana University system are broad scope licenses and must have an RSC to perform a variety of key functions that NRC currently provides for you, such as reviewing the qualifications of authorized users, approving radionuclides, forms, quantities and protocols for use under the license, evaluating locations of use and areas of use, and so on.

You can refer to 10 CFR Part 33 and NUREG 1556 Vol. 11 on our website for more information on broad scope licenses, which are relatively few in number. Most licensees are limited scope licensees, such as yourselves.

B. Kennedy

I also pointed out to Dr. Dziarski that most of your license commitments were contained in a Radiation Safety Manual (RSM) appended to your renewal application. An RSM, including yours, contains much more prescriptive detail about your radiation safety program than NRC requires and asks for. Please see NUREG 1556 Vol. 7, including but not limited to, Appendix C, for a better idea of the level of detail and types of information we need to review licensing correspondence for your type of program.

If you wish to discuss this further, please contact me at (630) 829-9841. My fax number is (630) 515-1078.

Also, in your next licensing action, please provide your fax number to complete our records also.

Finally, I have attached some general advice on how to renew your license and prepare the application using our guidance. This is only something I put together and have used for other licensees and not something that has been subject to NRC's review as "official guidance." Perhaps you will find it helpful.

I also added Condition Nos. 16 through 21, inclusive, which are standard conditions for your type of license that appeared to be missing. They serve to formalize certain commitments and aspects of your licensed program, making it easier to administer and understand. I made a minor correction to Condition No. 14 and the last condition of your license has been re-numbered to "22," as a result of the new Conditions being added. Condition No. 21, concerning inventory requirements, should have been included in your renewal application but since it was missing, I added the Condition, making your license complete now.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions.

B. Kennedy

Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

Sincerely,

A handwritten signature in cursive script that reads "Colleen Carol Casey".

Colleen Carol Casey
Materials Licensing Branch

License No. 13-18384-01

Docket No. 030-14970

Enclosures:

1. Amendment No. 21
2. Additional Guidance for
Renewing an NRC License

Additional Guidance for Renewing an NRC License

Please note that using the NUREG 1556 series documents will help ensure that your licensing correspondence is prepared more completely and in a less burdensome manner.

In preparing future licensing correspondence please focus on providing the information requested in Appendix C to NUREG 1556, Volume 7. Follow the "Suggested Format.." provided in this Appendix and use the suggested responses and model procedure/appendix references whenever possible, appending descriptive information as appropriate. It is strongly advisable to read the corresponding text in the front of each NUREG to ensure a complete understanding of the commitments that you make.

Please do not submit resumes, curricula vitae, college transcripts, any personal, proprietary information, blueprint diagrams, or copies of blueprint diagram and any extraneous, prescriptive information and procedures, unless we specifically request it, which is unlikely.

If you must deviate from a model procedure or suggested response, it may be possible to simply indicate what the deviation is and still use the model procedure/ suggested response as a "basic" commitment. Descriptive information may be "recycled" from previous documents only so long as it is current, complete information equivalent to the model procedure (as appropriate) and does not contain extraneous material.

It is in your best interests to only provide those commitments, statements, representations and procedures, in a clear and explicit manner, that we require to issue your license. These documents will form the basis for the license in the last condition of the license, called the "tie-down" condition.

You will realize the benefit of a reduced regulatory burden while enhancing safety and maintaining compliance and efficiency if you establish your license in this manner.

In fact, the easiest way to prepare a renewal, for example, is to take a copy of NUREG 1556, Vol. 7, Appendix C, to your copy machine and copy it out directly. Read the text in the front of the NUREG that corresponds to each section and simply fill in the checkmarks and blanks on the copied checklist, thereby making your license commitments.

Please do not re-type the checklist as errors and omissions may be introduced. As you need to append certain information or provide an alternative procedure, please be sure to incorporate the information in the NUREG, at a minimum, to ensure completeness.

B. Kennedy

Please see Appendix C to NUREG 1556, Vol. 7 A hard copy of this document should have been sent to you already. It is also available on our website at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v7>

If you wish, you may contact me at the telephone number above to discuss this further. We would be happy to assist you as we are able.