

CONVERSATION RECORD
(time) (date)

TIME | DATE

11/2/11

VISIT CONFERENCE TELEPHONE X

INCOMING
 OUTGOING

NAME OF PERSON(S) CONTACTED OR IN CONTACT

Roger Moroney

ORGANIZATION (OFFICE, DEPT. ETC.)

PETNET

TELEPHONE NO.

865-218-2595

william.moroney@siemens.com

201-2009

SUBJECT

C/N 318795

SUMMARY

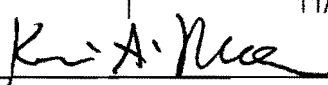
After review of PETNET's application for a new cyclotron production license at their St. Louis location, I requested that the applicant submit the following additional information:

- OK* 1. Submit an organizational chart that describes PETNET's management structure, reporting paths, and the flow of authority between executive management and the Radiation Safety Officer (RSO). Also, relative to radiation safety responsibilities and management control of licensed operations, please describe the joint venture between Saint Louis University and PETNET Solutions. Include the delineation of responsibility between both organizations.
- OK* 2. Page number 55876 of the Federal Register, Volume 72, Number 189, regarding the expanded definition of byproduct material states that individuals identified by the applicant with appropriate training such as engineers, physicists, radiochemists, etc., will be recognized as authorized users under a Part 30 license for the production of accelerator-produced radionuclides on a new NRC license if the applicant can demonstrate and confirm that these individuals performed essentially the same radionuclide production activities using an accelerator under the NRC's waiver, and as long as their duties and responsibilities did not significantly change. Therefore, please identify those individuals who meet these criteria that you wish to be named as authorized users on the license.
- call to verify* 3. Submit the make and model number of the sealed sources that are listed on page 5 of your application.
- OK* 4. Pages 120 and 121 of the application: Both facility diagrams are marked to be withheld because they contain security-related information. However, after review of the diagrams they do not appear to describe the exact location of material, and therefore would not need to be protected. Please resubmit these diagrams without a referencing them as security-related information. If necessary, also remove any references from the diagrams to specific locations where material is used or stored..
- OK* 5. Please conduct and submit results of surveys in all areas (both inside and outside of the building) directly adjacent to the cyclotron (both restricted and unrestricted areas) while the cyclotron is in operation so that we can evaluate the levels of radiation that exist. Please include the area directly above the cyclotron that is an outdoor area.
- OK* 6. Page 21 of the application (4th bullet): Given that significant exposure can occur when handling targets, windows, and target holders, please define criteria for determining when and if remote handling tools will be utilized when handling targets.
- OK* 7. Page 21 of the application (5th bullet): Define the alarming dosimeter set point to assure that the set point is set at a fraction of regulatory limits. *100 mR/hr?*
- OK* 8. Page 22 of the application (2nd, 3rd and 4th bullets): Define the frequency at which safety and warning devices and interlocks will be checked for function. Describe how each feature will be checked to verify functionality. *What is set response when ALARM activates?*

9. Regarding the section on page 22 entitled, "Effluent Control & Monitoring": Provide a description and diagram of the point of release of effluent from the cyclotron/pharmacy operations. Please also describe the point of release relative to the nearest air intake of the SLU hospital, entrance and exits to the hospital, and the nearest unrestricted areas.
10. Submit results of effluent released for CY 2010 and 2011 (to date), and RETNET's assessment of public dose from this data. *7.8 mrem - TLEDE ? (ext + int)*
- 3.2 mrem - Annual dose*
11. Explain or provide justification as to why effluent from the cyclotron is not filtered.
12. Describe the average concentration of F-18 released per day and estimated total activity released per year and submit an assessment that demonstrates that these values are in compliance with NRC regulations.
13. Describe your program for verifying the integrity of the delivery lines that supply F-18 to the hot cells and mini-cells from the cyclotron. Describe safety procedures for changing out delivery lines that may be contaminated with F-18.
14. Define more clearly the specific frequency for conducting both exposure rate surveys and contamination surveys.
15. Submit a "Delegation of Authority" for the Corporate RSO. Also submit a delegation of authority for the facility RSO.

ACTION REQUIRED

Submit a written response and refer as additional information to Control Number 318795

NAME OF PERSON DOCUMENTING CONVERSATION	SIGNATURE	DATE
Kevin Null		11/2/11

ACTION TAKEN

SIGNATURE

TITLE

DATE