From: Jorge I. Peirats [JPeirats@pmalaw.com]
Sent: Tuesday, April 03, 2012 5:28 PM
To: Modes, Kathy
Cc: Margarita Mercado Echegaray
Subject: The Radiology Institute Center/LEBA/Dr. Bonnet
Attachments: CLA CLOSE OUT SURVEY.PDF

52-24969-01
03030394

P.3

Dear Ms. Modes

I represent Banco Popular de Puerto Rico ("BPPR") which foreclosed on the offices and property of the above referenced entities. BPPR has not yet obtained legal title over the properties pending resolution of the removal and disposition of potentially radioactive materials identified by your office. Notwithstanding the aforesaid, the owner of the equipment and materials agreed to the removal by the designated and authorized entity which filed the attached certificates with your office, evidencing the actual removal and disposition of the materials and equipment. Would you be so kind as to providing BPPR with an estimate of when it can expect the NRC's determination as to the removal of the equipment and materials so that BPPR can proceed to obtain legal title over the real properties and dispose of them. I look forward to hearing from you.

Jorge I. Peirats

Pietrantoni Méndez & Alvarez LLC
Popular Center 19th Floor
208 Ponce de León Ave.
San Juan, PR 00918
Tel. (787)274-4904 Fax (787)274-1470
www.pmalaw.com

577225
NMSS/RGN1 MATERIALS-002

NRC FORM 314 (9-2007) 10 CFR 30.36(j)(1); 40.42(j)(1); 70.38(j)(1); and 72.54(k)(5)(i)(1)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0028 EXPIRES: 08/31/2010

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0028), 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.

CERTIFICATE OF DISPOSITION OF MATERIALS

LICENSEE NAME AND ADDRESS	LICENSE NUMBER	DOCKET NUMBER
The Radiology Institute Imaging Center Clinica Las Americas. Suite 202 + 108 400 F. D. Roosevelt Avenue Hato Rey, PR 00918-2129	52-24969-01	03030394
	LICENSE EXPIRATION DATE: June 4, 2012	

A. LICENSE STATUS *(Check the appropriate box)*

☐ This license has expired. ☐ This license has not yet expired; please terminate it.

B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

☐ 1. No radioactive materials have ever been procured or possessed by the licensee under this license.

☒ 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner.

☒ a. Transfer of radioactive materials to the licensee listed below:

7- sources to NRC License # 52-25430-03

☒ b. Disposal of radioactive materials:

☐ 1. Directly by the licensee:

☐ 2. By licensed disposal site:

☒ 3. By waste contractor:

23-sources to NRC License # 24-20091-01

☒ c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

C. SURVEYS PERFORMED AND REPORTED

☒ 1. A radiation survey was conducted by the licensee. The survey confirms:

☒ a. the absence of licensed radioactive materials

☐ b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.

☒ 2. A copy of the radiation survey results:

☒ a. is attached; or ☐ b. is not attached (Provide explanation); ☐ c. was forwarded to NRC on: _____ (Date)

☐ 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and

☐ a. The results of the latest leak test are attached; and/or ☐ b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (Include Area Code)	E-MAIL ADDRESS
David Rhoe	Consultant	787-245-7248	crmidnr@aol.com

Mail all future correspondence regarding this license to

C. CERTIFYING OFFICIAL

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE	SIGNATURE	DATE
Luis E. Bonnet-Alemar, M.D.		March 22, 2012

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 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.

RADIATION SAFETY CLOSE OUT SURVEY

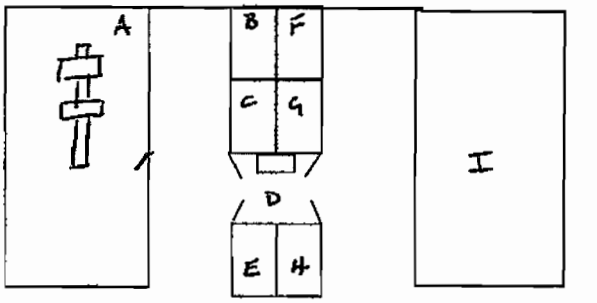
Date: March 21, 2012 Surveyor: David Rhoe

Facility: The Radiology Institute Imaging Center

Isotopes: Nuclear Medicine Lab/PET Tc-99m, Tl-201, Ga-67, etc

Room: 1st Floor - Nuclear Medicine Department

A. PET/CT room
   1. PET/CT table
   2. Door handle
   3. Floor doorway
B. Injection room
   4. Door handle
   5. Floor doorway & floor
C. Injection room
   6. Door handle
   7. Floor doorway & floor
D. Hot Lab
   8. Hot lab steel table
   9. Hot Lab cabinet
   10. Hot Lab floor
   11. Door handle
   12. Hot Lab doorways
   13. Door handles
E. Unfinished bathroom
   Never used
F. Injection room
   14 Door handle
   15. Floor doorway & floor
G. Injection room
   16. Door handle
   17. Floor doorway & floor
H. Unfinished bathroom
   Never used
I. Storage room



Determination of external radiation levels

Make: ludlum Model: 14C end window Serial No.: 114721

X	Gm	X	Background
	NaI		As Indicated
	Other		

Determination of removable surface contamination

X Make: Beckman Model: Gamma 5500 Serial No.: 8044788

Make: LSC-2V Model: V2 Serial No.: 002

X None Found (<2200 dpm/100 cm^2)

As Indicated

X No Isotopes used during the past two years

Comments: Check source reading 0.8 mR/hr - OK

RADIATION SAFETY CLOSE OUT SURVEY

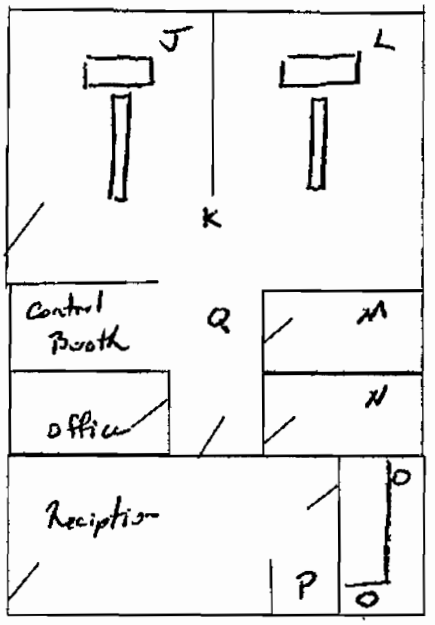
Date: March 21, 2012 Surveyor: David Rhoe

Facility: The Radiology Institute Imaging Center

Isotopes: Nuclear Medicine Lab/PET Tc-99m, Tl-201, Ga-67, etc

Room: 2nd Floor Nuclear Medicine Department

J. Spect camera 1
  18. Door handle
  19. Floor doorway
  20. Spect table
  21. Floor room
  22 PC keyboard
K. Thyroid uptake system
  23. PC keyboard
  24. Well counter
L. Spect camera 2
  25. Table
  26. Floor room
  27. PC keyboard
M. Hot Lab injection room
  28. Door handle
  29. Floor doorway
N. Hot Lab Bathroom
  30. Door handle
  31. Floor doorway
  32. Toilet & floor
O. Hot Lab
  33. Counter top
  34. Counter top & sink
  35. Door handle
  36. Floor doorwar and room
P. Hot Lab injection area
  37. Floor area
Q. Hallway
  38. Floor area



Determination of external radiation levels

Make: ludlum Model: 14C end window Serial No.: 114721

X	Gm	X	Background
	NaI		As Indicated
	Other		

Determination of removable surface contamination

X Make: Beckman Model: Gamma 5500 Serial No.: 8044788

Make: LSC-2V Model: V2 Serial No.: 002

X	None Found (<2200 dpm/100 cm^2)
	As Indicated
X	No Isotopes used during the past two years

Comments: Check source reading 0.8 mR/hr - OK

RADIATION SAFETY CLOSE OUT SURVEY

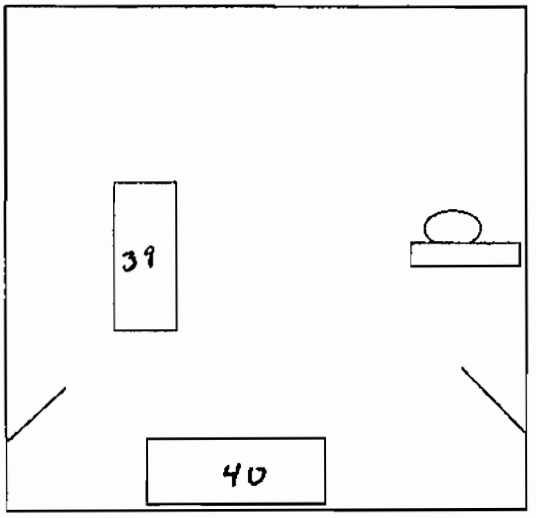
Date: March 21, 2012 Surveyor: David Rhoe

Facility: The Radiology Institute Imaging Center

Isotopes: Nuclear Medicine Lab/PET Tc-99m, Tl-201, Ga-67, etc

Room: 2nd Floor Stress Room

39. Treadmill, Belt and handles
40. Table top
41. Sink
42. Floor beside treadmill
43. Door handle - both
44. Floor doorway - both



Determination of external radiation levels

Make: ludlum Model: 14C end window Serial No.: 114721

X	Gm	X	Background
	NaI		As Indicated
	Other		

Determination of removable surface contamination

X	Make: Beckman	Model: Gamma 5500	Serial No.: 8044788		
	Make: LSC-2V	Model: V2	Serial No.: 002		
X	None Found (<2200 dpm/100 cm^2)				
	As Indicated				
X	No Isotopes used during the past two years				

Comments: Check source reading 0.8 mR/hr - OK

RADIATION SAFETY CLOSE OUT SURVEY

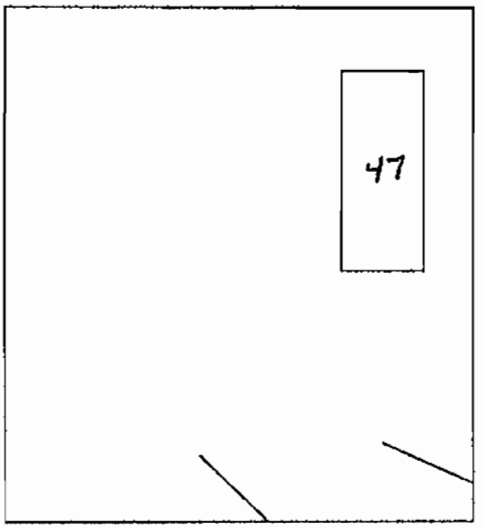
Date: March 21, 2012 Surveyor: David Rhoe

Facility: The Radiology Institute Imaging Center

Isotopes: Nuclear Medicine Lab/PET Tc-99m, Tl-201, Ga-67, etc

Room: 2nd Floor Office besides the MD office

45. Door handle - both
46. Floor doorway - both
47. Desk
48. Floor room



Determination of external radiation levels

Make: ludlum Model: 14C end window Serial No.: 114721

X	Gm	X	Background
	NaI		As Indicated
	Other		

Determination of removable surface contamination

X Make: Beckman Model: Gamma 5500 Serial No.: 8044788

Make: LSC-2V Model: V2 Serial No.: 002

X None Found (<2200 dpm/100 cm^2)

As Indicated

X No Isotopes used during the past two years

Comments: Check source reading 0.8 mR/hr - OK

RADIATION SAFETY CLOSE OUT SURVEY

Date: March 21, 2012 Surveyor: David Rhoe

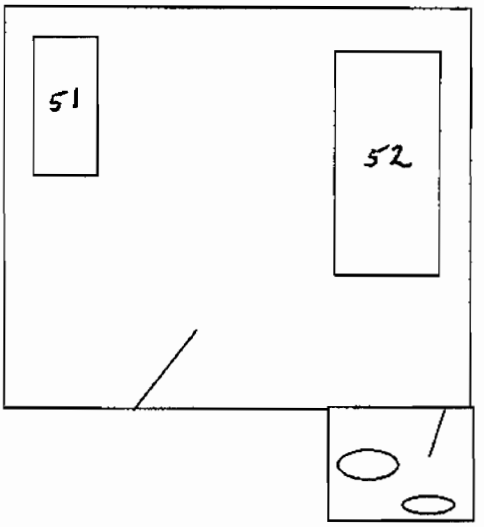
Facility: The Radiology Institute Imaging Center

Isotopes: Nuclear Medicine Lab/PET Tc-99m, Tl-201, Ga-67, etc

Room: 2nd Floor - Sonograph room

49. Door handle
50. Floor - doorway
51. Counter top
52. Patient table
53. Room floor
54. Bathroom floor & toilet

55. Bkg
56. Cs-137 Std
57. Am-241 Std



Determination of external radiation levels

Make: ludlum Model: 14C end window Serial No.: 114721

X	Gm	X	Background
	NaI		As Indicated
	Other		

Determination of removable surface contamination

X Make: Beckman Model: Gamma 5500 Serial No.: 8044788

Make: LSC-2V Model: V2 Serial No.: 002

X None Found (<2200 dpm/100 cm^2)

As Indicated

X No Isotopes used during the past two years

Comments: Check source reading 0.8 mR/hr - OK

Wipe #	CPM
1	63
2	63
3	64
4	72
5	71
6	82
7	96
8	81
9	67
10	76
11	74
12	69
13	92
14	64
15	68
16	90
17	83
18	70
19	67
20	73
21	68
22	87
23	82
24	69
25	85
26	95
27	101
28	69
29	84
30	94

Wipe #	CPM
31	77
32	74
33	72
34	76
35	88
36	70
37	81
38	86
39	80
40	73
41	63
42	56
43	65
44	80
45	91
46	85
47	82
48	68
49	88
50	74
51	80
52	72
53	85
54	102
Background	85
Cs-137 Std	35230
Am-241 Std	139968

All of the above readings are less than twice background.
Efficiency is 25.9%

Leak Test Record
NRC License 52-25430-01

Leak Tested For:	Clinic Las Americas
Leak Tested By:	David Rhoe
Standard Source:	Cs-137 NES-139S
Standard Activity:	0.105 uCi Nominally
Date of Standard:	9-Sep-88
Date of Leak Test:	28-Feb-12
Decay Activity:	0.06105 From decay chart
Standard (dpm):	135531
	Gamma
Instrument:	Beckman
Instrument Model Number:	5500
Instrument Serial Number:	8044788
Standard (cpm)	34885
Efficiency:	0.25739 25.7 %
Counting time (minutes)	1
Background (cpm)	84
Minimum Detectable Activity:	2.268E-05

Wipe (Smear) Test: All external or accessable surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured.

	Gamma	
Source ID and Serial Number	Wipe Test	Sample Activity
Cs-137 s356009-36 .209 uCi 9-19-88	91	0.00016
Ba-133 s358005-001 .273 uCi 9-22-88	84	0.00015
Co-57 MED3550 5.783 mCi 8-1-04	92	0.00016
Cs-137 1360-3-11 182.7uCi 4-1-09	84	0.00015
Na-22 Sn1245-77-31 thru 36 (10 uCi x 6) 9-1-07	84	0.00015
Na-22 E4-818-1245-82 100 uCi 9-1-07	66	0.00012
Au-195 8030-004 30 uCi 5-1-89	77	0.00013
C0-57 Nes 206 SnA-2360 5.496 mCi 7-1-94	110	0.00019
C0-57 Nes 206032-090 5.0 mCi 11-17-88	92	0.00016
Eu-152 500 nCi 3-1-04	88	0.00015
Eu-152 500 nCi 11-1-98	88	0.00015
Cs-137 500 nCi 4-1-04	88	0.00015
Cs-137 500 nCi 5-1-98	88	0.00015
Cs-137 500 nCi 4-1-09	88	0.00015
Cs-137 587-63-2 0.5 uCi 5-1-98	104	0.00018
Cs-137 790-93-75 0.5 uCi 4-1-04	104	0.00018
Gd-153 A7-310 and A7-312 (250 mCi x 2) 9-1-02	246	0.00043
Gd-153 D5-739 and D4-476 (250 mCi x 2) 8-1-06	246	0.00043
Gd-153 B9-673 and B9-674 (250 mCi x 2) 10-1-04	246	0.00043
Gd-153 5697 and 5690 (250 mCi x 2) 3-1-01	246	0.00043
Moly column	102	0.00018

This test reveals that 0.005 microcuries or less was present as removable contamination. Should the removable contamination exceed 0.005 microcuries, the source must be removed from use and necessary measures taken according to NRC regulations.

David Rhoe Health/Medical Physicist