

From: Crmidmr@aol.com
Sent: Wednesday, April 04, 2012 7:13 PM
To: Modes, Kathy; bonnetluis@hotmail.com; mmercado@pmalaw.com
Subject: Re: Request for Additional Information
Attachments: DaavidRhoereceptletter23sources.doc; NRC disposal info.doc

P-3

Please see attached

Dr. Bonnett, was the source in item 3 ever ordered?

#3. License items 6D, 7D, and 8D on your NRC license lists a 1.5 curie Scan-Detectronic 812.007 sealed source. Please indicate where this source was transferred; include confirmation of receipt

If so, what equipment did it belong too?

In a message dated 4/4/2012 4:30:56 P.M. Atlantic Standard Time, Kathy.Modes@nrc.gov writes:

Thank you Dr. Bonnet.

I cc'd David on the emails. I am awaiting his response.

From: Luis Bonnet [<mailto:bonnetluis@hotmail.com>]
Sent: Wednesday, April 04, 2012 4:10 PM
To: Modes, Kathy
Subject: RE: Request for Additional Information
Importance: High

As you know,I dont have this information as David Rhoe was the one who was in charged to due this work.Please contact David.If he needs to get.in touch with me have him call me 787 505- 0888

From: Kathy.Modes@nrc.gov
To: bonnetluis@hotmail.com
CC: Crmidmr@aol.com; mmercado@pmalaw.com; JPeirats@pmalaw.com
Date: Wed, 4 Apr 2012 07:36:55 -0400
Subject: Request for Additional Information

April 4, 2012

Docket No. 03030394 License No. 52-24969-01

Control No. 577225

Luis Bonnet-Aleamar, M.D.

Radiation Safety Officer

The Radiology Institute Imaging Center

Clinica Las Americas

Benitez St. B-15 Villa Lissette

Guaynabo, PR 00969

SUBJECT: THE RADIOLOGY INSTITUTE IMAGING CENTER, REQUEST FOR ADDITIONAL INFORMATION CONCERNING REQUEST TO TERMINATE LICENSE, CONTROL NO. 577225

Dear Dr. Bonnet-Aleamar:

This is in reference to your application dated March 22, 2012 requesting to terminate Nuclear Regulatory Commission License No. 52-24969-01. In order to continue our review, we need the following additional information:

1. Based on your NRC Form 314, we understand that you transferred seven (7) sources to a licensed company in Puerto Rico and the remaining 23 sources were shipped to another licensed company. Please provide confirmation from both licensed companies (License Nos.24-20091-01 and 52-25430-03) that they received the radioactive material. We need to account for all of the sources.
2. In addition, please provide the list of sources that each company now possesses. We need to confirm that each company is licensed to possess these sources.
3. License items 6D, 7D, and 8D on your NRC license lists a 1.5 curie Scan-Detectronic 812.007 sealed source. Please indicate where this source was transferred; include confirmation of receipt.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 577225. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5251 before April 20, 2012. **The Region I Office will be moving and we will have limited telephone service. Please see the attached pdf file for information regarding the move.**

If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Thank you for your cooperation.

Sincerely,

Kathy Modes

Kathy Modes

Senior Health Physicist

Decommissioning Branch

Division of Nuclear Materials Safety

cc:

David Rhoe, Consultant –CRMI

Representatives from Banco Popular de Puerto Rico

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R. M. WESTER *and ASSOCIATES, INC*
215 INDACOM DRIVE - ST. PETERS, MISSOURI 63376
(636) 928-9628 - FAX (636) 928-9857
RMWester.com

March 27, 2012

Mr. David Rhoe
Taseo De L a Fuente
D4 Calle Tivoli
San Juan, PR 00926-6459

Dear Mr. Rhoe,

This letter is to confirm receipt of the following sources from the Radiology Institute Imaging Center, Clinica Las Americas, Suite 108 & 202, 400 F.D. Roosevelt Ave., Hato Rey, PR by R. M. Wester and Associates, Inc. on March 26, 2012:

1. Gd-153 - 250 mCi - sn A7-312 (9/1/02)
2. Gd-153 - 250 mCi - sn A7-310 (9/1/02)
3. Gd-153 - 250 mCi - sn D5-739 (8/1/06)
4. Gd-153 - 250 mCi - sn D4-476 (8/1/06)
5. Gd-153 - 250 mCi - sn B9-673 (10/1/04)
6. Gd-153 - 250 mCi - sn B9-674 (10/1/04)
7. Gd-153 - 250 mCi - sn 5697 (3/1/01)
8. Gd-153 - 250 mCi - sn 5690 (3/1/01)
9. Cs-137 - 0.209 μ Ci - sn S356009-36 (9/18/88)
10. Cs-137 - 500 nCi - sn 587-63-2 (5/1/98)
11. Cs-137 - 500 nCi - sn 1344-23-87 (4/1/09)
12. Au-195 - 30 μ Ci - sn 8030-004 (5/1/89)
13. Co-57 - 5.783 mCi - sn MED3550 (8/1/04)
14. Co-57 - 5.496 mCi - sn A2360 (7/1/94)
15. Co-57 - 5.0 mCi - sn NES 206032-090 (11/17/88)
16. Eu-152 - 500 nCi - sn ??? (11/1/98)
17. Na-22 - 100 μ Ci - E4-818-1245-82 (9/1/07)
18. Na-22 - 10 μ Ci - sn 1245-77-31 (9/1/07)
19. Na-22 - 10 μ Ci - sn 1245-77-32 (9/1/07)
20. Na-22 - 10 μ Ci - sn 1245-77-33 (9/1/07)
21. Na-22 - 10 μ Ci - sn 1245-77-34 (9/1/07)
22. Na-22 - 10 μ Ci - sn 1245-77-35 (9/1/07)
23. Na-22 - 10 μ Ci - sn 1245-77-36 (9/1/07)

Please feel free to contact me if you need additional information.

Sincerely,

Joseph D. Koch, PhD, RPIH
Director of Operations
R. M. Wester and Associates, Inc.

"Specializing In Your Radiation Safety Needs"

1. Based on your NRC Form 314, we understand that you transferred seven (7) sources to a licensed company in Puerto Rico and the remaining 23 sources were shipped to another licensed company. Please provide confirmation from both licensed companies (License Nos.24-20091-01 and 52-25430-03) that they received the radioactive material. We need to account for all of the sources.

Attached is the confirmation for the disposal from R. M. Wester. I (David Rhoe) confirm that the other 7 sources were transferred to CRMI.

2. In addition, please provide the list of sources that each company now possesses. We need to confirm that each company is licensed to possess these sources. CRMI has the following sources:

Radionuclide In plastic	Source ID	No. of sources	Activity	Decayed Activity as of 2-1-2012	Date acquired
Ba-133	NES 358	1	273 uCi	59.8 uCi	9/22/1988
Cs-137	1360-3-11	1	182.7 uCi	171.7 uCi	4/1/2009
Cs-137	780-93-75	1	500nCi each	417 nCi	4/2004
Eu-152	1034-1-14	1	500nCi each	500nCi each	3/2004
Cs-137 (button)		2	5 uCi each	5 uCi each	
Moly ref source		1			

3. License items 6D, 7D, and 8D on your NRC license lists a 1.5 curie Scan-Detectronic 812.007 sealed source. Please indicate where this source was transferred; include confirmation of receipt.

This is an unknown source that was never in the inventory records.