

**From:** [Weidner, Tara](#)  
**To:** [Razmianfar, Nasser](#)  
**Subject:** Final RAI  
**Date:** Monday, May 14, 2012 11:48:00 AM

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License No. 47-23066-02  
Docket No. 030-20233  
Control No. 576453

To: Nasser Razmianfar, Radiation Safety Officer

**Please send a return e-mail to confirm that you received this message.**

This is in reference to the renewal application for this license. In order to continue my review, I need the additional information listed below.

1. In your response dated April 17, 2012, you stated that non-medical, "prospective authorized users must have ample experience before the RSC will authorize his or her use of radioactive materials or radiation producing devices." Also, the prospective AU must file an application with the Radiation Safety Office for a technical review of qualifications by the Radiation Safety Officer. Please provide a copy of the application for radioactive materials use.

In addition, confirm that the RSO's technical review will include an assessment of the prospective AUs prior training and experience (on-the-job or formal coursework). The training should cover (a) principles and practices of radiation protection, (b) radioactivity measurements, standardization, and monitoring techniques and instruments, (c) mathematics and calculations basic to the use and measurement of radioactivity, and (d) biological effects of radiation. The description of the use of licensed materials should include the specific isotopes handled, the maximum quantities of materials handled, where the experience was gained, the duration of experience, and the type of use.

2. Please confirm that all prospective medical authorized users, medical physicists, and nuclear pharmacists, provide a preceptor attestation statement as part of their documentation of training and experience. This includes individuals who provide a board certificate recognized by the NRC as well as individuals that follow the training and experience pathway. Individuals currently listed on an NRC or Agreement State license or a permit issued by a broad scope licensee or a master materials licensee are not required to provide a preceptor attestation statement.
3. With regards to your training program:
  - a. Confirm whether the applicable topics from Appendix J of NUREG-1556, Volume 9 will be included in training for medical/clinical staff.
  - b. Confirm whether the applicable topics from Appendix J and H of NUREG-1556, Volume 7 will be included in training for research staff.
  - c. Describe the details of the method that will be used to assess the effectiveness of training prior to allowing an individual to begin work with licensed material.
  - d. Confirm that ancillary staff (housekeeping, shipping/receiving, security staff) will

be included in your training program and the training will be commensurate with their assigned duties.

4. Based on the information you provided in your letter dated May 4, 2012, it appears that research activities involving human subjects is conducted, funded, supported, or regulated by another Federal Agency which has implemented the Federal Policy for the Protection of Human Subjects. Please confirm that that is the case at your institution.

If that is not the case, confirm that you will provide the following information for our review and approval:

- a. the type of research, isotope(s), chemical/physical form and activity.
  - b. the sponsor(s) of the research.
  - c. identification of the appropriate reviewing and approving committees (e.g., Institutional Review Board and Radiation Safety Committee).
5. Based on your response concerning the emergency procedure for the HDR, it appears that my question was not clear. In the event that it is impossible to place the source in the emergency container, what steps will be taken to restrict access to the treatment room until Varian Medical Systems arrives on-site?

In order to issue the renewed license in a timely fashion, please provide a written response to these items by May 21, 2012 under signature of senior management. This may be provided to my attention by e-mail and referencing mail control 576453.

Please contact me by e-mail with any questions you may have.

*Tara L. Weidner*  
*Health Physicist*  
*U.S. Nuclear Regulatory Commission*