

March 7, 2012

Ms. Colleen Carol Casey
Materials Licensing Branch
U.S. NRC Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

RE: Additional Information to Control Number 575088⁴ ² W
License Number 13-32694-01
Docket Number 030-37753
Baltes Cardiology Termination Request

Ms. Casey:

This letter responds to your letter of July 12, 2011 concerning the request of Baltes Cardiology, LLP to terminate Nuclear Regulatory Commission ("NRC") License Number 13-32694-01. Baltes Cardiology renews its request to terminate the license and provides this additional information in response to your July 12 letter in which you indicated that the NRC cannot approve the request because the information was insufficient. Specifically, you asked that two items be provided to complete your review: (1) a copy of the final leak test performed on the sealed sources; and (2) a copy of the final waste disposal records. This letter serves to supplement the letters from Marsha Baltes dated December 21, 2010 and May 4, 2011.

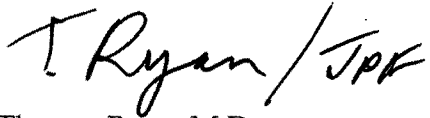
Baltes Cardiology, LLP closed on or about October 6, 2010. The date of service for the last patient receiving a nuclear medicine test at Baltes Cardiology was September 30, 2010. The radionuclide used for this testing was 99mTc. See the Radiopharmaceutical Log Book attached as Attachment 1. I served as the Radiation Safety Officer and Matthew Hall, CNMT, served as our Certified Nuclear Medicine Technician. Mr. Hall provided nuclear medicine technology services for the office under my supervision. Mr. Hall's responsibilities included utilizing proper methods for the use and storage of radioactive materials, performing wipe tests and area radiation surveys, and preparing, surveying and cleaning the radiotherapy isolation room. Attached is a true and accurate affidavit of Mr. Hall as Attachment 2. The decay-in-storage document attached to Hall's Affidavit, as Exhibit A, is dated August 2, 2010. This is the last waste disposal record. Therefore, the last documented metering of the decay in storage was on August 2, 2010. NC Systems decommissioned the lab and camera. Mr. Charlie H. Rose, MA, MSPH, D(ABSNM) of NC Systems represents that there was no decay in storage upon his decommissioning. Again, the only radionuclide used was 99mTc. Therefore, any decay in storage waste would have been completely decayed by the date of the decommissioning. The decommissioning and final survey documents were attached to the May 4, 2011 letter.

RECEIVED MAR 13 2012

The last sealed source wipe test performed occurred on February 15, 2010. Attached as Exhibit B to Hall's affidavit is the documentation. The last documented Sealed Source Leak Test and Inventory is attached as Attachment 3.

If you have further questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "T Ryan / JPK". The signature is written in a cursive, somewhat stylized font.

Thomas Ryan, M.D.

Attachments:

Attachment 1 – Radiopharmaceutical Log Book

Attachment 2 – Hall Affidavit

Exhibit A to Hall Affidavit – Disposal by Decay-In-Storage Record

Exhibit B to Hall Affidavit – Wipe Results Report

Attachment 3 – Sealed Source Leak Test and Inventory

STATE OF INDIANA)
) SS:
COUNTY OF ALLEN)

AFFIDAVIT OF MATTHEW HALL, CNMT

I, Matthew Hall, CNMT, being first duly sworn upon my oath, state as follows:

1. I am an adult over the age of eighteen and make this affidavit based upon my personal knowledge.

2. I was a certified nuclear medicine technician in good standing with the Nuclear Medicine Technology Certification Board. I was employed by Baltes Cardiology, LLP as a certified nuclear medicine technician. In that capacity, I provided nuclear medicine technology services for the office practice under the supervision of the radiation safety officer, Dr. Thomas P. Ryan.

3. Baltes Cardiology had a nuclear scanner in the office used to perform testing on its patients. My responsibilities included among others utilizing proper methods for the use and storage of radioactive materials, performing wipe tests and area radiation surveys, preparing, and surveying and cleaning the radiotherapy isolation room.

4. My last day of employment was October 1, 2010. The date of service for last patient receiving a nuclear medicine test at the office was September 30, 2010. I understand the medical practice of Baltes Cardiology, LLP closed on shortly thereafter.

5. I have been informed that Baltes Cardiology requested to terminate its NRC license #13-32694-01 and the Nuclear Regulatory Commission has asked for the final waste disposal

records and the final leak test performed on the sealed sources. The documents related to the disposal of the decay-in-storage and leak tests were maintained in the Master Hot Lab Binder.

6. During my employment, I disposed of the materials and supplies used in the testing, such as cotton swabs and IV tubing, by placing them in a container marked "radioactive" for at least 10 times the half-life of the radioactive material being used. This is what is commonly referred to as "decay-in-storage." The decay-in-storage document dated August 2, 2010, attached as Exhibit A, is the last waste disposal records contained in the Binder.

7. As for the final waste disposal, I do not recall the trash being emptied upon my termination. Therefore, the last metering of the decay in storage would have been the August 2010 dated measurement. My termination was fairly abbreviated and I was not present upon the decommissioning of the hot lab and camera and can only refer to Mr. Chuck Rose's attestation that there was no DIS upon his decommissioning. As a result, my knowledge of these two aspects is limited by the documentation and the above-referenced attestation of Mr. Chuck Rose. However, the radionuclide used was ^{99m}Tc . Therefore, any decay in storage waste would have been completely decayed by the date of the removal.

8. I also performed wipe tests on sealed sources. According to my review of the 2010 documents in the Binder, the last sealed source wipe test performed occurred on February 15, 2010. Attached as Exhibits B is the documentation. I did not perform a wipe test beyond the February date sealed source wipe test. Therefore, the February dated wipe test was the last one done. I acknowledge that a wipe test should have been done around the time of my termination from Baltes Cardiology in September 2010.

I AFFIRM UNDER THE PENALTIES FOR PERJURY THAT THE FOREGOING STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

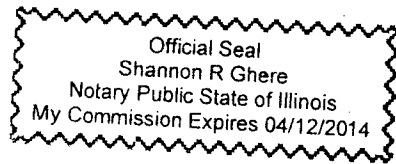
Dated: 10/19/11

Matthew Hall
Matthew Hall, CMNT

10/19/11

Shannon R Ghere

I/2657143.5



DISPOSAL BY DECAY-IN-STORAGE RECORD

Storage Container	Input			Survey Prior to Disposal				Disposal				
	Date	Isotope	Activity	Date	Instrument	Bkg*	Container**	By	Date	Route	By	Notes
Trash Bin		Tc-99m		4-20-09	Bicron GM	0.02 mR/hr	0.02 mR/hr	MLA	4-20-09	Waste	MLA	
Trash Bin		Tc-99m		5-26-09	LUDLUM 14C	0.02 mR/hr	0.02 mR/hr	MLA	5-26-09	Waste	MLA	
Trash Bin		Tc-99m		7-13-09	LUDLUM 14C	0.02 mR/hr	0.02 mR/hr	MLA	7-13-09	Waste	MLA	
Trash Bin		Tc-99m		8-24-09	LUDLUM 14C	0.02 mR/hr	0.02 mR/hr	MLA	8-24-09	Waste	MLA	
Trash Bin		Tc-99m		11-9-09	LUDLUM 14C	0.02 mR/hr	0.02 mR/hr	MLA	11-9-09	Waste	MLA	
Trash Bin		Tc-99m		2-22-10	LUDLUM 14C	0.02 mR/hr	0.02 mR/hr	MLA	2-22-10	Waste	MLA	
Trash Bin		Tc-99m TB 20		8-2-10	LUDLUM 14C	0.02 mR/hr	0.02 mR/hr	MLA	8-2-10	Waste	MLA	

*Must be less than 0.05 mR/hr

**Must be the same as background, at the surface of the container, all shielding removed

- NOTE:
- >All radionuclides must have half-lives of less than 65 days.
 - >Place the material in the Decay-in-Storage container only after substantial decay in the shielded container (at least 5-10 half lives) and
 - >Remove or violate all radiation symbols and radioactive material signs prior to placing the radioisotope in the bag and container which must be marked.
 - >Separate needles and other BioHazards from the radioactive materials for proper disposal as stipulated by State and OSHA regulations.

Nuclear Cardiology Systems, Inc.
National Laboratory
5660 Airport Blvd., Suite 101
Boulder, CO 80301

Wipe Results Report

Monday, February 15, 2010 9:46 AM

Area: Leak Test

Sealed Source Area, RSO Trigger at 100% of Federal Guidelines, Well

Location: Cs-137 Reference Source: 1296-4-23

>LLD	>Trigger	Isotope	Trigger	LLD	Background	Count Time	Activity
No	No	• Cs-137	0.005 uCi	1.262e-05	uCi 7.925e-05 uCi	60 sec.	0 uCi

Area: Leak Test

Sealed Source Area, RSO Trigger at 100% of Federal Guidelines, Well

Location: Co-57, Reference: 1296-10-20

>LLD	>Trigger	Isotope	Trigger	LLD	Background	Count Time	Activity
Yes	No	• Co-57	0.005 uCi	3.384e-06	uCi 3.414e-05 uCi	60 sec.	5.597e-06 uCi

Location: Co-57, FLOOD: 12718C

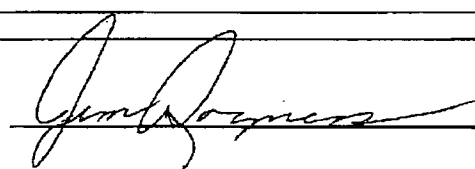
>LLD	>Trigger	Isotope	Trigger	LLD	Background	Count Time	Activity
No	No	• Co-57	0.005 uCi	3.384e-06	uCi 3.414e-05 uCi	60 sec.	1.119e-06 uCi

Technologist: Matthew Hall, CNMT

Comments:

Naltes Cardiology
Fort Wayne, IN
Wipes taken 02/11/10

Signature: _____



Date: _____

2/15/10

A450 1.0.8

Sealed Source Leak Test and Inventory

Licensee: Fl. Wayne Cardiovascular Imaging, LLC

Address: 625 West Berry Street

City: Fort Wayne State: IN Zip: 46802

License #: 13-32694-01 Telephone: (260) 439-0074

Sample Identification / Analysis

Source	1	2	3	4
Nuclide	Co-57	Co-57		137-Cs
Mfg	QSA	IPL		IPL
Model	FLOOD	REF		REF
Serial	12718C	1296-10-20		1296-4-23
Assay Date	22 Apr 2006	1 May 2008		1 Apr 2008
Activity	10.0 mCi	5.427 mCi		201.1 uCi

Current

Activity	1.83 mCi	1.01 mCi		192.6 uCi
Location	Hot Lab	Hot Lab		Hot Lab
Use	Camera	Dose Calibrator		Dose Calibrator

Wipe

Date	02/11/2010	02/11/2010		02/11/2010
By	Mathew Hall, CNMT	Mathew Hall, CNMT		Mathew Hall, CNMT

Assay

Date	02/15/2010	02/15/2010		02/15/2010
µCi	1.119e-06	5.597e-06		0

LLD

µCi	3.384e-06	3.384e-06		1.262e-05
-----	-----------	-----------	--	-----------

Analysis

<0.005µCi	x	x		x
>0.005µCi				

Next Leak Test Due: (every 6 mo.) 08/2010 Next Inventory Due: (every 3 mo.) _____

Comments/Actions: **PASSED**

Assay Performed By: Jim Rogness - NCS Date: 02/15/2010

RSO Signature: _____ Date: _____



NC Systems, Inc. • Licensed Leak Testing • Colorado 751

5600 Airport Blvd., Suite 101, Boulder, CO 80301 • (800) 548-4024 • (303)-541-0044 • (303)541-0088 FAX

SealedSourceLeakTestInv6-02




EILBACHER FLETCHER
ATTORNEYS

Ms. Colleen Carol Casey
Materials Licensing Branch
U.S. NRC Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

803 S. CALHOUN STREET | 4TH FLOOR | FORT WAYNE | INDIANA 46802

