



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

August 28, 2012

Docket No. 03036028
Control No. 577973

License No. 47-25597-01

M. Suzanne Romeo, M.D.
Medical Director
The Greenbrier Clinic
320 West Main Street
White Sulphur Springs, WV 24986-2414

SUBJECT: THE GREENBRIER CLINIC, REQUEST FOR ADDITIONAL INFORMATION
CONCERNING APPLICATION FOR RENEWAL OF LICENSE, CONTROL NO.
577973

Dear Ms. Romeo:

This is in reference to your application dated July 23, 2012 requesting to renew Nuclear Regulatory Commission License No. 47-25597-01. In order to continue our review, we need the following additional information:

1. In your cover letter to your application, you indicate that you split unit dosages for administrations and document the split accordingly. While this practice is not specifically prohibited by NRC regulations, it is not a routine practice observed. Please confirm that a record of the administration is made for each patient in accordance with 10 CFR 35.2063. In addition, please note that the issue of splitting dosages may not meet other non-NRC regulatory requirements for financial reimbursement.
2. Confirm that you do not currently use PET isotopes and that if you initiate their use in the future, you will notify the NRC of the facility design, including shielding, for this use.
3. Please confirm if you "reserve the right to upgrade (y)our survey instruments, as necessary, as long as they are adequate to measure the type and level of radiation for which they are used."
4. The trigger levels described in Appendix R of NUREG-1556, Vol. 9 for removable contamination and area surveys in unrestricted areas is 1000 dpm/100 cm² and 0.1 mR/hour, respectively. Please confirm whether you will implement these trigger levels.
5. Please describe areas located above and below the nuclear medicine department.
6. Please confirm that "Safe Use" procedures described in Item 10 will be written.

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. 577973. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5169.

Please note that the office of the Region I Division of Nuclear Materials Safety has moved effective May 9, 2012. Our new address is:

U. S. Nuclear Regulatory Commission
Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Also, the NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement is not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Sincerely,

Original signed by Penny Lanzisera

Penny Lanzisera
Senior Health Physicist
Medical Branch
Division of Nuclear Materials Safety

cc:
Karen M. Logan, C.N.M.T., Radiation Safety Officer

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