

**From:** [Weidner, Tara](#)  
**To:** [lbarreca@rtsx.com](mailto:lbarreca@rtsx.com)  
**Cc:** [Seeley, Shawn](#)  
**Subject:** NRC Request for Additional Information - renewal  
**Date:** Tuesday, February 10, 2015 1:15:00 PM

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License No.: 47-26296-01  
Docket No.: 03033538  
Control No.: 584999

\*\*\*\*\* **PLEASE CONFIRM RECEIPT OF THIS E-MAIL** \*\*\*\*\*

Mr. Barreca,

This is in reference to the application dated September 17, 2014, requesting to renew Nuclear Regulatory Commission License No. 47-25296-01. In order to continue our review, we need the following additional information:

1. Please confirm that extremity monitors will be provided to individuals who may be called upon to respond to an emergency involving an un-retracted or stuck HDR source.
2. Please describe the methods utilized to ensure the console keys will be inaccessible to unauthorized persons whenever the device is not in use or unattended. Please further describe your method of securing the device when not in use. Please refer to your letter dated April 28, 2011, for an acceptable response.
3. Please confirm that spot checks will be performed after each source installation.
4. Please confirm that you wish to remove the model 105.999 from the list of authorized devices.
5. Please describe the areas above and below the HDR room and indicate whether they are designated as restricted or unrestricted areas.
6. 10 CFR 35.643(b) states in part that the spot check procedures shall be performed in accordance with written procedures established by the authorized medical physicist. Please submit your detailed step-by-step procedures for how you verify the proper operation of electrical interlocks; source exposure lights on the unit, console, and facility; viewing and intercom systems; emergency response equipment; radiation monitors to indicate source position; timer accuracy; date and time on unit's computer; and the decayed source activity in the unit's computer. In addition, include in your step-by-step procedures the acceptance criteria for each test.
7. Please note that the HDR unit you possess has the ability to operate in a pulse dose rate mode. Please conform that you will only operate the device in high dose rate mode.

8. Please describe the dosimetry system used for source calibration pursuant to 10 CFR 35.630.
9. In your application you stated, in part, that Daniel H. Galmarini, Leandro J. Barreca, and Eric A. Lee have been delegated the authority to make legally binding statements with regard to the radioactive materials license applications, renewals, amendments, terminations and inspections. In an effort to ensure timely communications in the future, please provide the titles, physical addresses, current e-mail addresses, telephone and fax numbers for the aforementioned people as well as Daniel E. Dosoretz and Melvin Chaney.

In addition, please specify whether or not the information provided is appropriate for public release.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://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).

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and 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.

We will continue our review upon receipt of this information. If you have any technical questions regarding this deficiency letter, please call Shawn Seeley at (610) 337-5102. You may fax your response to his attention to 610-337-5269 or scan and e-mail your reply to [shawn.seeley@nrc.gov](mailto:shawn.seeley@nrc.gov). Please reference Mail Control No. 584867 in your response.

In order to continue prompt review of your application, we request that you submit your response to this letter within 20 calendar days from the date of this letter.

As a reminder, please have a member of management approve and sign any submittal to this office.

Sincerely,

Tara L. Weidner  
Senior Health Physicist  
USNRC