From: Gallaghar, Robert
Sent: Tuesday, March 31, 2015 1:10 PM
To: 'maines@portermedical.org'
Subject: Request for Additional Information - Mail Control No. 585974

PLEASE RESPOND TO THIS REQUEST FOR ADDITIONAL INFORMATION BY RETURN EMAIL

License No. 44-19050-01
Docket No. 030-15288
Control No. 585974

Dear Ms. Aines;

This is in reference to your application dated January 22, 2015 requesting to renew Nuclear Regulatory Commission License No. 44-19050-01. In order to continue our review, we need the following additional information:

1. Your application should have been signed by a management representative rather the Director of Radiology. Please submit a letter signed by a management representative indicating that management has reviewed the application and concurs with the statements and representations contained therein. Note also that a management representative should sign all future correspondence that requests a change in your license.

2. Your application states, in Section 8.21, that a radiation protection is not applicable because your institution does not perform therapy studies. Please note that the regulations in 10 CFR 20.1101 states that each licensee must develop, document, and implement a radiation protection program commensurate with the scope of the licensed activity. The program must be sufficient to ensure compliance with the provisions of 10 CFR Part 20 regulations. Please confirm that you have developed, documented and implemented a radiation protection program that is sufficient to ensure compliance with 10 CFR Part 20 regulations.

3. You are currently authorized to possess and use byproduct materials permitted by 10 CFR 35.200. The Energy Policy Act of 2005 revised the definition of byproduct material to include, in part, any material made radioactive by use of a particle accelerator. Positron emission tomography (PET) radiopharmaceuticals now fall into byproduct material category. Please confirm that you do not require the use of PET materials. Alternatively, please submit detailed shielding diagrams along with shielding calculations for your PET facility.

4. Please provide the manufacturer and model number for any sealed source that do not meet the criteria in 10 CFR 35.65 (e.g. greater than 30 millicuries).

5. Please provide a description of the detectors used on the radiation monitoring instruments (e.g. portable count rate meter, dose rate or exposure meter) that will be used to perform radiation level detection, measurement, and contamination surveys.

6. Please confirm that you will develop, implement and maintain written procedures for the safe use of unsealed byproduct materials that meet the requirements of 10 CFR 20.1101 and 20.1301.

We will continue our review upon receipt of this information. Please reply to my attention and refer to Mail Control No. 585974. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5182.

Robert L. Gallaghar
Health Physicist
U.S. NRC, Region I
2100 Renaissance Blvd.
King of Prussia, PA 19406
(610) 337-5182 office
(610) 337-5269 fax