

# PETNET Solutions

April 13, 2015

Mr. Kevin Null  
US Nuclear Regulatory Commission  
Region III  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

**Re:** Reply to the NRC Form 699 Conversation Record (Docket No. 030-38230) dated April 9, 2015 regarding both the PETNET St. Louis RAM Licenses 41-32720-03 (Production) and 41-32720-04MD (Nuclear Pharmacy).

Dear Mr. Null:

Please accept this letter as PETNET's response to the Nuclear Regulatory Commission's (NRC) Conversation Record (Docket No. 030-38230) dated and received on April 9, 2015.

## **Action #1**

*Provide a description of any effort to date to dispose of any licensed material under both licenses.*

## **Response to Action #1**

PETNET has begun the process of surveying and removing laboratory equipment from the facility. These items were determined to be free of fixed and removable radioactive contamination, i.e., indistinguishable from background. Released items will be shipped and stored at Rowe Transfer, 5320 South National Drive, Knoxville, TN 37914. The survey report shall be available for review upon completion of the removal process.

## **Action #2**

*Include a commitment that material will not be used for any purpose, pending disposal.*

## **Response to Action #2**

PETNET commits that no material will be used for any purpose, pending disposal.

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**Action #3**

*Describe where material will be stored and how it will be secured from unauthorized access.*

**Response to Action #3**

All radioactive materials are properly stored in disposal containers and secured within the locked cyclotron room. Only authorized personnel have the access code to enter this area.

**Action #4**

*Identify the individual who will be responsible for maintaining control of licensed material while it is in storage. Demonstrate that this person has a working knowledge of basic radiation safety practices and regulations.*

**Response to Action #4**

Nicholas Ackles is responsible for maintaining control of licensed material during the closure transition. Mr. Ackles has been a radiation worker for the PETNET St. Louis staff for approximately 7 years. Mr. Ackles training certificates are enclosed (Attachment A).

**Action #5**

*Describe a periodic inventory of material in storage to verify that the material remains in secured storage and is not being used.*

**Response to Action #5**

Mr. Ackles is currently performing monthly inspections of the facility's remaining contents. As stated above, no material is being used for any purpose.

**Action #6**

*Describe any planned changes to decrease or limit the radiation safety program as a result of placing material in storage, e.g., dosimetry program, training program, calibration services, etc.*

**Response to Action #6**

PETNET has ceased the following radiation safety programs: 1) Effluent Monitoring, 2) Area Monitoring (i.e., dosimeters) in the pharmacy and garden area, 3) Radiation and

Contamination Surveys, 4) Audit Program, 5) Dose Calibrator Calibrations, 6) Transportation, and 7) RAM Distribution.

The following radiation safety programs are still in effect: 1) Personnel Monitoring (for Nick Ackles), 2) Inventory and Leak Test of Sealed Sources, 3) Waste Management, and 4) Survey Meter Calibrations. These programs will remain in effect until the site's decommissioning efforts have been approved by the NRC.

**Action #7**

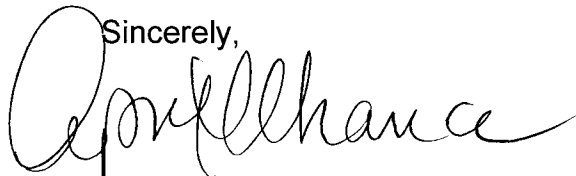
*Commit to leak testing any sealed sources when they are removed from storage before they are transferred for disposal.*

**Response to Action #7**

PETNET commits to leak testing any sealed sources upon removal from storage and prior to transfer for disposal.

Should you require additional information, please feel free to contact me at the number listed below or Ramón Davila at 865-218-3295 or ramondavila@siemens.com.

Sincerely,



April Chance, CHP  
Senior Manager of Radiation Protection/Environment, Health & Safety  
Molecular Technologies Division of Siemens Molecular Imaging  
(PETNET, Cyclotrons and Sources)  
810 Innovation Drive  
Knoxville, TN 37932  
(865) 308-3887 mobile  
(865) 218-6355 office  
[april.chance@siemens.com](mailto:april.chance@siemens.com)

cc: Tigran Sinanian, RPh, BCNP, Sr. Director of Manufacturing Operations  
Ramón Davila, MBA, RRPT, Regional Health Physicist  
John Beyer, RPh, RSO, Regional Operations Director

**Attachment A**

**Nicholas Ackles Training Certificates**

# Training Certificate

FILE COPY

COPY

This certificate is awarded to:

*Nicholas Ackles*

In recognition of successful completion of:

**Operations I Training**  
Course #POP0505

December 5 - 7, 2007

Presented by PETNET® Pharmaceuticals, Inc.

**SIEMENS**

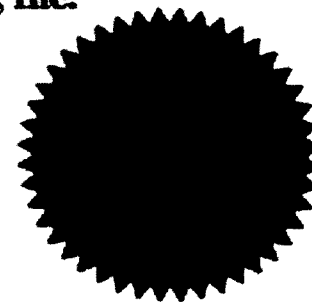
PETNET Solutions

  
\_\_\_\_\_  
Instructor, Danny Bingham

  
\_\_\_\_\_  
Training Manager

December 7, 2007

\_\_\_\_\_  
Date Issued



# Training Certificate

COPY

*This certificate is awarded to:*

*Nicholas Ackles*

**Radiation Protection Training  
for Nuclear Pharmacy Employees**

December 5 - 7, 2007

*This training is designed to satisfy the General Awareness, Function-Specific and Safety Training Requirement of 49 CFR 172.704(A).  
Training was conducted by Siemens Medical Solutions Molecular Imaging Radiological Compliance Department for  
PETNET Pharmaceuticals, Inc. in Knoxville, Tennessee.*

**SIEMENS**

**PETNET Solutions**

Christi Elam, Regional Health Physicist

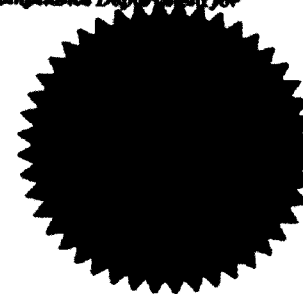
Instructor Name and Title

*Christi Elam*

Instructor Signature

January 7, 2008

Date Issued



COPY

# Training Certificate

*This certificate is awarded to:*

*Nicholas Ackles*

*In recognition of successful completion of the Transportation of Radioactive Materials Class,  
in regulations of the United States Department of Transportation, concerning the legal  
transportation of materials designated as hazardous and for achieving a passing grade.*

## **D.O.T./Hazardous Materials Training**

**December 7, 2007**

*This training is designed to satisfy the General Awareness, Function-Specific and Safety Training Requirement of 49 CFR 172.704(A).  
Training was conducted by Siemens Medical Solutions Molecular Imaging Radiological Compliance Department  
for PETNET Pharmaceuticals, Inc. in Knoxville, Tennessee.*

**SIEMENS**

**PETNET Solutions**

**Christi Elam, Regional Health Physicist**

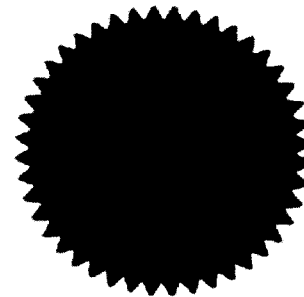
**Instructor Name and Title**



**Instructor Signature**

**January 7, 2008**

**Date Issued**



Boston



FILE COPY

**Mr. Nicholas Ackles**

has successfully passed the

**Eclipse Cyclotron Professional Certificate**

on May 27, 2008

with the following knowledge profile:

- Safety Issues
- Preventive Maintenance
- Corrective Maintenance
- System Trouble Shooting

Valid thru May 2010  
Certified since May 2008

*V. Frode*

Training Center Erlangen  
Date: May 27, 2008

*[Signature]*

Instructor

NM10CLP6

**SIEMENS**  
medical



Boston

# FILE COPY Certificate

**Mr. Nicholas Ackles**

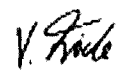
has attended the course

## **Advanced Eclipse Systems NMSECLIPS**

from May 19, 2008 to May 30, 2008  
at Knoxville, TN

with the following course contents:

- Review of Safety
- Vacuum system fault recovery
- Ion Source diagnostics and troubleshooting
- System calibrations
- RF Amplifier design and rebuild
- RF amp tuning and troubleshooting
- RF control system diagnostics
- Targetry troubleshooting
- Control system and interlocks troubleshooting
- Operating Software Upgrade and Maintenance



Training Center Erlangen  
Date 30.05.2008



Instructor

medbra

From: (865) 218-3295  
Ramon Davila  
PETNET Solutions, Inc.  
810 Innovation Drive  
Knoxville, TN 37932

Origin ID: RKWA



Ship Date: 14APR15  
ActWgt: 0.5 LB  
CAD: 105091792/MNET3810

Delivery Address Bar Code



Ref # St. Louis 50-919  
Invoice #  
PO #  
Dept #

SHIP TO: (630) 829-9854

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US Nuclear Regulatory Comm. R111  
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LISLE, IL 60532

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