

**From:** [Gaskins, Farrah](mailto:Gaskins.Farrah)  
**To:** [ghisel@stfranciscare.org](mailto:ghisel@stfranciscare.org)  
**Subject:** Request for additional information for License No. 06-16624-01  
**Date:** Thursday, October 29, 2015 7:35:00 AM

---

Dear Mr. Hisel,

This is in reference to the letter dated September 11, 2015 requesting to amend Nuclear Regulatory Commission License No. 06-16624-01 and to follow-up on our telephone conversation on October 28, 2015. As discussed, we will need the following information in order to continue our review:

1. You will be named Radiation Safety Officer (RSO) on the license. Since you are an outside consultant/contractor, in support of this request, please address the following:
  - a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.
  - b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.
  - c. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).
  - d. Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.
  - e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.
2. You requested Mozafareddin Karemeddini, M.D. to be added to the license as an authorized user for In-Vitro Studies. Please note that this license does not authorize In-Vitro Studies and we cannot grant this authorization for Dr. Karemeddini.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select Nuclear Materials; Med, In, & 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).

You may respond to my attention in writing by letter, email (if scanned into a pdf format), or fax (610-337-5269), referencing mail control number 588935. Please ensure that your response is signed by an appropriate licensee management representative.

Please feel free to contact me with any questions you may have.

*Farrak C. Gaskins*

Health Physicist

U.S. NRC, Region 1

2100 Renaissance Blvd, Suite 100

King of Prussia, PA 19406

(610) 337-5143 office

(610) 337-5269 fax