UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E. LAMAR BLVD
ARLINGTON TX 76011-4511

November 19, 2015

Mr. V. Troy Curnutt
Radiation Safety Officer
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1951 Bench Road, Suite F
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SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

The Nuclear Regulatory Commission (NRC) has completed the technical review of the renewal application dated July 17, 2015, and amendment request dated November 12, 2015, and additional information is needed to complete the licensing process. Please provide a response in a signed and dated letter within 30 days of receipt of this letter and make reference to mail control number 588416.

1. The renewal application contains several procedures that were developed by the licensee. A cursory review of these procedures identified potential errors which are listed below.

   A. Page 13: Reference to old mailing address for NRC Region IV.

   B. Pages 23, 24 and 25: Reference to an action level for surface (removable) contamination of 22,200 dpm/100 cm^2. The typical action level for beta/gamma is 2,200 dpm/100 cm^2.

   C. Page 47: Decay Waste – The last paragraph of this section, as written, will lead the reader to decay-in-storage Co-57 markers and then dispose of it as normal trash once radiation levels are indistinguishable from background radiation. Co-57 half-life is 271 days; therefore, the decay-in-storage option and subsequent disposal as normal trash is not an acceptable disposal method and is contrary to 10 CFR 35.92, Decay-in-Storage.

   Appendix C of NUREG-1556, Volume 9, revision 2, provides a checklist that allows licensee's to make commitments regarding their radiation safety program. These commitments are designed to provide the licensee with flexibility in developing, implementing and maintaining procedures. Not committing to the language contained in Appendix C checklist will leave the licensee vulnerable to potential violations if changes are made to the Radiation Safety Manual and these changes are not approved in a licensing action. Item 2 below, provides these commitments. Please correct Item 1.A., 1.B., and 1.C, and provide the commitments identified in item 2 below.

2. Commit to the following language:

   A. “Radiation monitoring instruments will be calibrated by a person qualified to perform survey meter calibrations.”

   B. “Either we will perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in 1 year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will provide dosimetry that meets the requirements listed under “Criteria” in NUREG-1556, Volume 9, revision 2, “Consolidated Guidance About Materials Licensees: Program-Specific Guidance About Medical Use Licensees.”

   C. “We have developed and will implement and maintain written procedures for area surveys in accordance with 10 CFR 20.1101 that meet the requirements of 10 CFR 20.1501 and 10 CFR 35.70.”

   D. “We have developed and will implement and maintain written procedures for safe use of unsealed byproduct material that meet the requirements of 10 CFR 20.1101 and 10 CFR 20.1301.”

   E. “We have developed and will implement and maintain written procedures for safe response to spills of licensed material in accordance with 10 CFR 20.1101.”

   F. “We have developed and will implement and maintain written waste disposal procedures for licensed material in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of 10 CFR Part 20, Subpart K, and of 10 CFR 35.92.”

3. Provide implementing procedure that shows compliance with 10 CFR 35.80, Provision of mobile medical service.

4. Provide a sample letter of agreement between the licensee and a client for which services will be rendered that permits the use of byproduct material at the client’s address, and that clearly delineates the authority and responsibility of the licensee and a client.

5. Indicate if the locations of use shown in condition 10.B. of the current license (amendment number 06) will remain the same in the renewed license, or provide updates as applicable.

6. The renewal application contains the maintenance protocol for a Siemens e.Cam system, presumably for a gamma camera. Enclosed is sealed source and device registration certificate number IL-605-D-105-S for line source holder/attenuation correction device for model Profile (for Ecam); C.clear (for Symbia) and C.clear (for Ccam). Provide information about type of radionuclide, sealed source manufacturer’s name and model number, maximum activity per source, number of sources, maximum possession limit, and purpose of use.

7. Page 15 of the renewal application describes security considerations for the mobile coach. Review the restrictions described in condition 10.C. of the current license and revise the security section of the Radiation Safety Program to be in alignment with condition 10.C. Keep in mind that licensed material also includes waste. If you believe that condition 10.C. needs to be updated then provide alternate language and supporting amended security procedures.

8. For consultant-RSO or contractor, provide the following:

   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. The statement should include the consultant-RSO's minimum amount of onsite time (hours per week).

   B. Identification of an in-house representative who will serve as the point of contact during the RSO's absence.

   C. A description of the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of 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/her presence.

NRC's Regulatory Issue Summary (RIS) 2005-31 provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through the NRC's Agencywide Documents Access and Management System (ADAMS). The RIS may be located on the NRC Web site at: http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/. Pursuant to NRC's RIS 2005-31, the enclosure will not be made publicly available.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

Thank you for your cooperation.

Sincerely,

/RA/

Roberto J. Torres, M.S., Senior Health Physicist
Nuclear Materials Safety Branch B

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Control: 588416

Enclosure: As stated