



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

November 25, 2015

Docket No. 03033825
Control No. 587133

License No. 45-25330-01

Rand S. Wachsstock, DVM
President / Radiation Safety Officer
Radiocat, PC
6651-F Backlick Road
Springfield, VA 22150

SUBJECT: RADIOCAT, PC; LICENSE RENEWAL; CONTROL NO. 587133

Dear Dr. Wachsstock:

This refers to your application dated May 28, 2015 for renewal of your NRC license. Enclosed with this letter is the renewed license. Please note that the license has been renewed for a period of six months only as described below. Review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region I Office, Licensing Assistance Team, (610) 337-5239, so that we can provide appropriate corrections and answers.

A review of your renewal application and documentation submitted in support of your application identified several items requiring additional review. A request for additional information was sent to Eli Port via email on October 23, 2015 and he responded with a letter dated November 24, 2015. After reviewing his response, we have additional questions and items we would like clarified. In order to provide you additional time to address these items fully, your license has been renewed for a period of six months, with minimal changes. Please submit the following additional information when you submit your renewal request, which is due by December 31, 2015:

1. Since the locations of use are leased facilities, please provide additional information on how Radiocat is provided exclusive use and control (i.e., do non-Radiocat employees have access to these facilities).
2. Your response dated November 24, 2015 referred to attached facility diagrams, which indicated areas of material receipt, shielding, ventilation, etc. Please provide the referenced facility diagrams. In addition, please indicate what areas are located above and below the areas of use.
3. Please provide a description of the periodic air sampling of waste compaction.
4. Please provide the following statement with regard to instrumentation: "We reserve the right to upgrade our survey instruments as necessary." In addition, please confirm that meters not calibrated will be tagged "Do not use."
5. Please provide your bioassay procedures.

6. You indicated that in the event that an animal dies during its treatment of feline hyperthyroidism, you will hold the body for decay in storage (80 days) or the exposure rate at one meter is 0.5 mR/hr (which is the same as your release criteria). Please confirm that the disposal of the deceased cat will be in accordance with waste disposal procedures (i.e., at background levels prior to disposal).
7. The renewal application dated May 28, 2015 and the deficiency response dated November 24, 2015, should have been signed by a senior management representative of Radiocat. When the additional information is submitted for the full license renewal, please submit a NRC Form 313 signed by a senior management representative, and have them confirm that they have reviewed the application dated May 28, 2015 and the letter dated November 24, 2015, and concur in the statements and representations contained therein. Future amendment requests may be signed by a delegate.
8. You indicated that each facility has a local treating veterinarian who acts as the on-site Assistant Radiation Safety Officer (RSO). Please provide the name of the Assistant RSO at each location, and a description of the training provided to that individual.
9. Please provide a description of the process for delegating RSO authority when the RSO is absent for a month, and a description of the training provided to the delegate.
10. Please provide the details of the audits conducted by Radiocat's auditor (i.e., the qualifications/training of the auditor, if on-site audits conducted, etc.). Also provide a description of how the results of the audits are relayed to the RSO and management.
11. Please confirm that all instrumentation used to perform measurements in accordance with 10 CFR Part 20 (bioassays, area radiation levels, wipe surveys) will be calibrated on all scales with a radiation source.
12. Please confirm that package receipt surveys will include a requirement to survey the external surface of a "labeled package" or a damaged package.

The NRC expects licensees to conduct their programs with meticulous attention to detail and high standards of safety and compliance. Because of the serious consequences to employees and the public that can result from failure to comply with NRC requirements, you must conduct your program according to NRC regulations, the conditions of your NRC license, and the representations made in your application. In particular, note that you must:

1. Operate in accordance with NRC regulations 10 CFR Part 19, "Notices, Instructions and Reports to Workers; Inspections," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Notify the NRC in writing of any change in mailing address.
3. In accordance with 10 CFR 30.36(d), notify the NRC, promptly, in writing, and request termination of the license:
 - a) when you decide to terminate all activities involving materials authorized under the license; or

- b) if you decide not to acquire or possess and use authorized material.
4. Request and obtain a license amendment before you:
 - a) change Radiation Safety Officers;
 - b) order byproduct material in excess of the amount, or radionuclide, or form different than authorized on the license;
 - c) add or change the areas of use, or addresses of use identified in the license application or on the license; or
 - d) change the name or ownership of your organization.
 5. Submit a complete renewal application or termination request at least 30 days before the expiration date of your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of byproduct material after your license expires is a violation of NRC regulations.

You will be periodically inspected by the NRC. Failure to conduct your program safely and in accordance with NRC regulations, license conditions, and the representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, imposition of a civil penalty, or an order suspending, modifying or revoking your license.

An environmental assessment for this action is not required, since this action is categorically excluded under 10 CFR 51.22(c)(14).

Current NRC regulations and guidance are included on the NRC's website at 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/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.

R. Wachsstock

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Thank you for your cooperation.

Sincerely,
Original signed by Tara L. Weidner

Tara L. Weidner
Senior Health Physicist
Medical Branch
Division of Nuclear Materials Safety

Enclosure:
Amendment No. 28

cc:
Eli A. Port, C.H.P., Health Physicist

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SUNSI Review Complete: RElliott

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