



January 19th, 2016

Sara A. Forster, MS
Materials Licensing Branch
United States Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

RE: License No. 10-29283-02
Docket No. 030-38357/ Reference Control #5889574

Dear Ms. Forster:

In response to your letter dated January 2016, we would like to answer your questions and give you confidence that I can monitor the radiation safety aspects of this program.

First, let me respond by saying that while I am on several Agreement State licenses, I am no longer on any of the licenses listed in your letter as this was provided as documentation of my recent training/experience. I am a Senior Nuclear Medicine Physicist with Landauer Medical Physics, and also the new Corporate RSO for Digirad Imaging Solutions, Inc. on several agreement state licenses for Digirad mobile Nuclear Cardiology sites.

Landauer Medical Physics has taken the full responsibility as of January 1, 2016 to oversee the entire Digirad Radiation Safety program, previously administered by West Physics.

I will not be spending time on a weekly basis in any of these facilities, due to the limited time frame that the staff are at the Hub sites on a weekly basis. They are visited frequently by their "Area Nuclear Medicine Supervisor", who is free to move from one NRC location to another NRC location, as needed. I will mandatorily be on-site at each of the facilities at least once each year to do my own annual review of the program.

1. Landauer and I will be:
 - a. reviewing and updating the radiation safety program manual and forms including an expanded emergency response program.
 - b. providing additional and annual radiation safety training to all nuclear medicine staff; including DOT Hazmat training.
 - c. reviewing all dosimetry (internally) on a monthly basis with fast dosimetry report turnaround and action plans.
 - d. counseling declared pregnant workers

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- e. holding quarterly regional WEBEX Meetings with the nuclear Medicine staff and their area supervisor for the three states in order to
 - i. update operational policies and procedures.
 - ii. review findings of their quarterly nuclear medicine audits.
2. Landauer Medical Physics has multiple senior-level physicists throughout the Midwest and Northwest including Chicago, Illinois, St. Louis, Missouri and Upstate New York, who can be activated to respond to emergencies as necessary, typically within two hours. I can fly into the areas within two hours from my location.
3. Landauer Medical Physics has put the area supervisor for these NRC facilities, Richard Lawhorn, through an ASRT approved **40- hour Radiation Safety Officer** course to assist in the emergency response for his sites. He will be acting as an Assistant RSO.
4. I can be alerted to respond to an emergency 24 hours a day Monday-Friday through two cell phones; two email addresses linked to my cell phones; and a backup call line to my Administrative Support staff, who are available from 8 a.m. until 8 p.m. Eastern Monday- Friday. A second emergency phone line rolls over to Landauer, Inc. which will automatically call me after 5:00 p.m. central.
5. When I am on vacation or out of pocket these facilities and their area supervisor will be given additional Landauer Emergency Responders.
6. While I have other commitments as RSO, the majority are similar Digirad Hubs with similarly trained Digirad area supervisors and local Medical Physicists who can be activated to respond to radiation emergencies, and there should be no adverse impact.

From the standpoint of safety and consistency of operations, there are many advantages to my role as RSO for Digirad. I hope this letter provides the additional background to answer your questions and to provide confidence in our ability to monitor these radioactive material programs and respond as needs arise. Should you need additional information, please, do not hesitate to request it.

Respectfully submitted,

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DocuSigned by:

Jeremy Callahan, Vice-President
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SUBJECT: New License Application Addendum

DATE: January 20, 2016

NO. PAGES: 3

COMMENTS:

Response to your letter dated January 6, 2016- Additional Questions