

Wally - I cannot work with either document you sent me - the letter dated 9/27/16 about removing FD-103 seeds or the letter dated Oct 6, 2016 to remove old hot lab. It looks like you did not use the information I sent to you via email on Sept. 9, 2016, although you acknowledged receiving it. The Decommissioning advice was of particular importance + relevance. Please review this + we need to schedule a phone call to discuss. Most of the information we needed was not provided, very incomplete. Thanks.

From: Fuhrman, Wally [mailto:Wally.Fuhrman@ssmhealth.com]
Sent: Sunday, September 11, 2016 12:55 PM
To: Casey, Colleen <Colleen.Casey@nrc.gov>
Cc: Rumph, Jerald <Jerald.Rumph@ssmhealth.com>
Subject: [External_Sender] RE: Amendment status and helpful information

Colleen Carol Casey
630-879-9841
Colleen.Casey@nrc.gov
I'm working the rest of the week.

Hi Colleen,

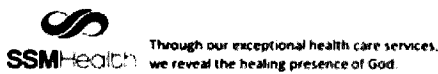
Please use the fax number below to send me the amendment for relocation of the hot lab. Fax: (314)577-5399
Thanks for the additional information. It is very appreciated.

Thanks again,

Wally Fuhrman BA, RSO, CNMT, RT(R)(N)
SSM Radiation Safety Consultant for St Louis Region
SSM Network Radiation Safety Officer
SSM Network Nuclear Medicine Consultant
NM Coordinator for Missouri University-Columbia, Mo
E-mail: Wally.Fuhrman@ssmhealth.com
Office: (314)268-4012
Cell: (314)795-0891
Pager: (314)999-0323
Fax: (314)577-5399

License No:
24-15159-01
Docket: 030-08664
Contract No.:
592079

Cardinal Glennon Children's Hospital
1465 S. Grand Blvd.
St Louis, Mo. 63104
Office# G315



From: Casey, Colleen [mailto:Colleen.Casey@nrc.gov]
Sent: Friday, September 09, 2016 5:14 PM
To: Fuhrman, Wally <Wally.Fuhrman@ssmhealth.com>
Subject: Amendment status and helpful information
Importance: High

Dear Wally,

I finished your amendment today and it is in "mail out" here for processing by our administrative staff. On Monday, I will coordinate a time with you to fax a copy of it over to ensure you have it before the move date.

Just to be sure you have the information about close out surveys and removal of materials from your license, I'm attaching some language I've put together over the years to use when these types of situations arise. This is not official NRC guidance, just some information I cobbled together that you may find useful.

The second document I included for good measure. It is also just some information I put together over the years that covers how to request an expedited review, if or when it is needed, and required signatories information. I wasn't sure if I had sent this to you previously and wanted to be sure you had it.

Talk to you Monday to arrange the fax. Thanks.

(Please call me) "Colleen"

Colleen Carol Casey, Colleen.Casey@nrc.gov

Materials Licensing Reviewer

U.S. Nuclear Regulatory Commission

Region III

2443 Warrenville Road

Suite 210

Lisle, IL 60532-4352

Colleen.Casey@nrc.gov

(630) 829-9841 Direct, Central time zone

(630) 515-1078 Fax

NRC 24 HR Operations Center

(301) 816-5100 (Eastern time zone)

Gentle Reminders: Unless previously arranged with or requested by me directly, please do *not* submit any unsolicited licensing requests, responses or correspondence via e-mail.

Please only submit *one complete, physically and legibly signed* copy of your correspondence to us. *"Draft" and/or unsigned documents will not be accepted.*

Please prepare your licensing requests in accordance with NUREG 1556 Series Guidance at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>

Thank you very much!

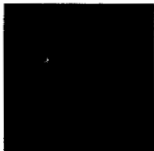
Please also note that my full-time work schedule includes every other Friday off.

Ensuring the health and safety of

our people, our nation and

our environment

<http://www.nrc.gov/>



Casey, Colleen

From: Casey, Colleen
Sent: Friday, September 09, 2016 6:03 PM
To: Fuhrman, Wally
Subject: FW: Amendment status and helpful information
Attachments: Decom.missioning.helpful.stuff.ltr.version.best.docx;
EXPEDITE.REQUESTS.SIGNATORIES.best.combo.docx.doc
Importance: High

Just noticed I probably sent first one to wrong email address. Oops!

(Please call me) "Colleen"

Colleen Carol Casey, Colleen.Casey@nrc.gov

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From: Casey, Colleen
Sent: Friday, September 09, 2016 5:13 PM
To: 'Fuhrman, Wally' <Wally_Fuhrman@ssmhc.com>
Subject: Amendment status and helpful information
Importance: High

Dear Wally,

I finished your amendment today and it is in "mail out" here for processing by our administrative staff. On Monday, I will coordinate a time with you to fax a copy of it over to ensure you have it before the move date.

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(Please call me) "Colleen"

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Thank you very much!

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ATTACHMENTS

This is Decommissioning
advice attachment

We cannot authorize licensees to release the "locations/addresses of use" or "areas of use" from licenses for unrestricted use (even by other staff members) until we have received and reviewed a copy of the results of final status surveys, i.e., "decommissioning" and "close-out surveys," for the affected facilities.

The final status surveys must include a complete historical review of all *actual licensed materials possessed, used, stored, etc.*, including sealed sources and unsealed materials, spills, and contamination.

If sealed sources were transferred or disposed of as part of the close-out of this location of use, area of use or license, please provide a copy of the final leak test result for each sealed source; a copy of an acknowledgment of receipt from the licensed entity who took possession of each source, with an appropriate level of detail to identify the source and recipient; the NRC license number or license copy of the recipient/transferee; and if the recipient/transferee is an Agreement State licensee, please include a current copy of its license that clearly shows it is licensed to receive your sources.

If unsealed materials were transferred or disposed of as part of the close-out of this license, please provide a copy of an acknowledgment of receipt from the licensed entity who took possession of each material; and if the recipient/transferee is an Agreement State licensee, please include a current copy of its license that clearly shows it is licensed to receive your materials.

Please note that bills of lading, shipment manifests and shipping papers do not usually contain sufficient information to demonstrate that materials have been safely received by an appropriately licensed entity. They typically indicate that materials were prepared for shipment or transfer only, not that they were received and accepted into the recipient's inventory under its license.

An assumption of decay for relatively short-lived materials is insufficient to support a termination request absent submission of appropriate surveys, source transfer documentation, etc., as outlined in this letter.

The following references may assist you: 10 CFR 30.41; 10 CFR 30.51; 10 CFR 35.13; 10 CFR 35.14; 10 CFR 35.92; 10 CFR 35.2092; NUREG 1556 Vol. 9, Rev. 2, section 11, "Termination of Activities," (if you have a medical program; check the "Termination of Activities" section in other volume(s) in the NUREG 1556 series for other than medical programs at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>); "NRC Form 314" at <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc314.pdf>; and NUREG 1757, Vol. 1, Rev. 2 at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v1/>.

Your complete historical review should specify when and where all licensed materials, including materials in 10 CFR 31.11 (only if appropriate), *were actually possessed* under the license and used, when the last use was for each material or modality and how, when and by whom were the materials disposed of (shipped off site, decayed -in-storage, sanitary sewer disposal, etc.) or transferred.

If your license historically authorized radioactive materials and/or modalities that you never used, then please so state specifically. Please be mindful that NRC will review your inspection history.

For licensed materials and waste that were "decayed - in - storage" (DIS), please include a copy of the final disposal record showing that licensed materials were decayed appropriately and disposed of in accordance with NRC's regulatory requirements and the terms of the license.

For other licensed material waste streams (only if appropriate), such as incineration (volume reduction), animal carcasses, shipment for burial, compaction, vial disposal, and so on, provide copies of appropriate records to demonstrate "cradle to grave accountability."

The final records needed will vary based upon the chemical and physical forms of materials; their associated half-lives; and the form(s) of disposal employed.

Unless you are specifically directed to do so, please do not submit "all" records from the beginning of the license to the present. Please only submit the last, or final, records for leak tests, DIS disposal, etc.

If you have any questions, please contact me directly.

Alternately, you may contact a staff reviewer by calling USNRC, Region III, the Materials Licensing Branch, (630) 829-9887 during normal business hours and asking to speak with the "Materials Reviewer on call."

Please respond by stating exactly which licensed materials were used at each authorized location historically and please submit final status survey information covering those radioactive materials.

The final status surveys should consist of exposure rate measurements to show that all sources of radioactive material have been removed, and contamination checks of areas where radioactive materials were used or stored.

Radiation levels associated with surface contamination and removable contamination should not exceed those specified in your license or in NUREG 1757 Vol. 1, Rev. 2 at:
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v1/>

Please submit the following information with your close-out survey:

- a. Diagrams of each facility (area(s) of use and/or locations/addresses of use) with exposure rate survey and wipe test results keyed to specific locations, as appropriate.

Meaningful units (milliroentgen, millirem, dpm, etc.) should be stated. Gross results and/or net results should be stated and described appropriately. "Counts per minute (cpm)" and similar units are unacceptable.

- b. The name of the person(s) performing the survey.
- c. The date(s) the survey was performed.
- d. The instrument(s) used for exposure rate measurements and for analysis of the wipes. It is expected that instruments used will be appropriate for the types of radiation being detected.

- e. Background readings and each instruments' efficiency or correction factor.
- f. The date(s) that the survey instrument(s) were last calibrated. Please *do not* state when the instrument(s) are "due" to be calibrated in the future. Please *do* state when the instrument(s) were last calibrated.
- g. The action levels for both exposure rate measurements and wipe tests. Include the functional identity of areas exceeding these levels, corrective actions taken and results of corrective actions taken. A reasonable sampling of all surfaces likely to exhibit residual radioactive material or to contain radiation sources should be taken.
- h. If sealed sources were used in the affected areas/locations, please include a copy of the most recent leak test results for each source. If sources were transferred please provide the license number (if a current Region III NRC licensee) or a copy of the license for the transferee, or a copy of the license and/or permit for the broad scope licensee who took possession of the sources. Appropriate acknowledgment(s) of receipt should be submitted for "cradle to grave" accountability.

Please always include the telephone number and fax number of at least one person who serves as a point of contact for all future licensing requests. It is also helpful to provide us with the email address of at least one contact person.

Please ensure that a senior management representative signs the amendment request. Please ensure that a management representative signs the amendment request, in accordance with 10 CFR 35.12(a), as appropriate, for medical programs.

This is second attachment.

- 1 -

"Expedite" Requests:

To assist us in serving you more efficiently, it would be helpful to contact us by telephone if an emergent medical situation or compelling business situation arises either before or after you have submitted an amendment request to your license or new license application and if you can justify and support the need for that particular amendment to be moved up in our normal reviewing queue.

Having this information enables our management to best decide how to handle your expedite request.

Please note that we normally process all licensing actions, including amendment requests, new license applications and renewals, in the order in which they are received, i.e., "first come, first served."

As stated in our acknowledgment card, sent to all who submit correspondence for our review, the initial review for amendments and new license applications is normally completed within 90 days of receipt, as an internal goal only.

The initial review for renewals, as an internal goal only, is normally completed within 180 days of receipt. The technical quality of your submission is a primary factor that only you can control in order to enable us to help you more promptly and minimize delays in the reviewing process.

Preparing your new license and amendment requests carefully and in accordance with NRC's regulatory requirements and guidance, especially the documents in the NUREG 1556 series, as well as other information on our website at <http://www.nrc.gov>, will greatly help ensure that your correspondence is complete and accurate in all material respects, as 10 CFR 30.9 (a) requires it to be.

Ideally, if you know of an emergent medical situation or compelling business situation impacting your license and you need a licensing action completed by a certain specific date (not "stat" or "as soon as possible," etc.), please advise us of the particulars of the situation, the specific date when the new license or amendment is needed and the specific justification and support for it, which should be briefly summarized.

Please also ensure that an appropriate senior management official (required by 10 CFR 35.12(a)) and/or your Radiation Safety Officer signs and dates the new license application or amendment request letter. Please include the name of at least one knowledgeable contact person who is familiar with your new license application or amendment request, his or her direct telephone number, and the best fax number to transmit the completed amendment to you. A business email address for the contact person may also be helpful in many circumstances.

Please address all licensing correspondence to: "ATTN: Materials Licensing Branch Chief" at the address shown below.

"Please also be reminded of the provisions in 10 CFR 30.9(a), "Completeness and accuracy of information,"..."(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's

*ALSO
IMPORTANT*

regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects.”

Signatures Required for Materials Licensing Correspondence and Best Practices

To help ensure that an application for a new, amendment or renewal materials licensing request is complete and may be acted upon by NRC, all incoming licensing correspondence must be signed by an appropriate certifying officer for the materials licensee in question.

An applicant's or licensee's legal representative, administrative assistant, outside consultant, etc. will not suffice as a certifying officer.

As enumerated below, for all materials applicants and licensees, and as noted for medical/human use applicants and licensees, all initial requests for licensing requests must be signed, in order to comply with the regulatory requirements listed below.

If a certifying officer/management representative signs an “initial” licensing request that names someone else as a “point of contact,” then the designated point of contact may be the sole signatory for any written responses related to that initial licensing request only, unless the NRC reviewer requests otherwise.

All subsequent “new/initial” licensing requests must then be signed appropriately.

Please always sign every licensing document and communication submitted, even if you sign an email and transmit it to us via email/PDF or fax.

Sending us an email and/or a fax and/or a hard copy mailed document are simply “means of transmission” and not a substitute for an appropriate signatory on the actual documents being transmitted.

Unsigned email messages, electronically generated or imposed “signatures,” stamped signatures, etc. are not acceptable substitutes for an actual, physically hand-written legible signature.

Submitting any licensing correspondence without a signature, or with an unacceptable signature, may delay the review process until an acceptable signature is obtained on the document(s) in question.

Please be reminded that 10 CFR 30.32(a) and (c) require:

“(a) A person may file an application on NRC Form 313, “Application for Material License,” in accordance with the instructions in § 30.6 of this chapter.” And,

“(c) Each application shall be signed by the applicant or licensee or a person duly authorized to act for and on his behalf.”

Please note that the NRC Form 313 requires the typed or printed name and signature of a certifying officer. The NRC Form 313 can be found at:

<http://www.nrc.gov/reading-rm/doc-collections/forms/nrc313.pdf>

If the NRC Form 313 is not used, then a business letter containing all of the information on the NRC Form 313 may be used instead.

10 CFR 30.9(a) requires: “ (a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects.”

For medical/human use applicants and licensees:

10 CFR 35.12 Application for license, amendment, or renewal requires:

“(a) An application must be signed by the applicant's or licensee's management.”

10 CFR 35.2, “Definitions” states, in part:

“Management means the chief executive officer or other individual having the authority to manage, direct, or administer the licensee's activities, or those persons' delegate or delegates.”

Please address all licensing correspondence to: “ATTN: Materials Licensing Branch Chief” at the address shown below.

Colleen

Colleen Carol Casey, Colleen.Casey@nrc.gov

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Ensuring the health and safety of our people, our nation and our environment <http://www.nrc.gov/>

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 Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.