



12 May 2017

Sara A. Forster
Health Physicist Licensing Reviewer
U.S. Nuclear Regulatory Commission, Region III
Division of Nuclear Materials Safety
2443 Warrenville Road – Ste. 210
Lisle, IL 60532-4352

RE: Additional Information request for Triad Isotopes, Inc., NRC Lic. No. 09-32781-04MD, CN594669

Dear Ms. Forster:

The following additional information for control number 594669 for amendment request dated 2-22-2017 is submitted below:

1. The relocation of the generators and the removal of the blood hood occurred on January 10, 2017. No actual renovation or construction took place. Only the relocation of the Mo-99/Tc-99m generators and the removal of one blood hood took place.
2. No outside construction workers/contractors were used for the relocation of the Mo-99/Tc-99m generators or removal of the blood hood. Members of Triad Isotopes Facilities team performed the relocation and removal. All Triad team members complete annual radiation safety training.
3. An Authorized Nuclear Pharmacist listed on the RAM license was present during the relocation and removal.
4. The nuclear pharmacy remained secured as per policy during the entire relocation and removal activities with supervision by an Authorized Nuclear Pharmacist listed on the RAM license.
5. No actual construction took place. Only relocating the Mo-99/Tc-99m generators and the removal of a blood hood took place. This relocation and removal of the blood hood had no effect on the effluent monitoring. The blood hood works with self-contained, recirculating air flow. The dedicated I-131 effluent monitoring system was not changed in any way.

Please contact Neil Stubbs, Pharmacy Safety Specialist, if you have any questions at (419) 705-1359 or nstubbs@triadisotopes.com.

Thank you,

Neil Stubbs, CNMT, RT(N)
Pharmacy Safety Specialist
Triad Isotopes, Inc.
Office/Cell: 419-705-1359
Fax: 407-455-6732
Email: nstubbs@triadisotopes.com

Cc: David Persinger, R.Ph., RSO
Debra Rogers, MA, Paralegal – Licensing and Regulatory Coordinator
Triad Isotopes Quality and Safety Department

Song, Taehoon

From: Forster, Sara
Sent: Wednesday, May 17, 2017 12:24 PM
To: Pavon, Sandy; Song, Taehoon; Sandrik, Lauren
Subject: FW: RE: Additional Information request for Triad Isotopes, Inc., NRC Lic. No. 09-32781-04MD, CN594669
Attachments: Triad Isotopes.Request for Additional Information NRC Lic. No.pdf

Please scan in and return to me. Thank you!

From: Neil P. Stubbs [mailto:NStubbs@triadisotopes.com]
Sent: Friday, May 12, 2017 1:04 PM
To: Forster, Sara <Sara.Forster@nrc.gov>
Cc: David W. Persinger <DPersinger@triadisotopes.com>
Subject: [External_Sender] RE: Additional Information request for Triad Isotopes, Inc., NRC Lic. No. 09-32781-04MD, CN594669

Dear Ms. Forster,

Please find attached the response for additional information to the CN594669. If you have any further questions, please do not hesitate to contact me.

Neil Stubbs CNMT, RT(N)
Pharmacy Safety Specialist
Triad Isotopes, Inc.
Pottstown, PA
(419) 705-1359 (office/cell)

From: Forster, Sara [mailto:Sara.Forster@nrc.gov]
Sent: Thursday, May 11, 2017 3:10 PM
To: Neil P. Stubbs <NStubbs@triadisotopes.com>
Subject: Additional Information request for Triad Isotopes, Inc., NRC Lic. No. 09-32781-04MD, CN594669

Dear Mr. Stubbs:

We have reviewed your February 22, 2017 letter ([ML17055C351](#)) requesting to add three Authorized Users (AUs) and to revise your facility diagram for areas where radioactive material will be used or stored under the license. Additional information is needed to complete our review. As we discussed, based on our review of the above referenced license file, the plans for renovating your facility are unclear, including the work plan and the impact of the relocated hoods, etc., on air flow and effluent monitoring. Accordingly, please respond to the items below, as noted.

1. Provide the anticipated date(s) when the remodel will be completed.
2. Confirm that construction workers involved in the remodel have or will receive site-specific radiation safety training commensurate with the potential radiation safety fields they may encounter while working in the pharmacy.
3. Confirm that there will be an appropriate Triad staff pharmacist present during the remodel when construction workers are present.

4. Confirm that all radioactive material will be properly secured prior to the construction workers entering the restricted area.
5. Please confirm that any construction changes will not affect the air flow in the facility and associated effluent monitoring.

As discussed, in order to incorporate the facility changes into the referenced action, we expect that you will submit additional information on or before close of business on Friday, May 12, 2017. If you are unable to respond by tomorrow, please let us know when you will be able to provide a response. The facility changes would be handled separately. Additional guidance may be found in NUREG 1556, Vol. 13, rev. 1, "Program Program-Specific Guidance about Commercial Radiopharmacy Licenses," which may be found at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v13/r1>

Submission of your response as a pdf file attached to an email or via facsimile will allow for the quickest processing. Any response must be submitted under a signed and dated cover letter. Do not hesitate to call me with any questions you may have, or if you will need additional time to complete your response.

Sincerely,

Sara A. Forster, Health Physicist Licensing Reviewer

U.S. Nuclear Regulatory Commission - Region III

Division of Nuclear Materials Safety

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