UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

FEB 01 2018

Steve Min, D.O.
Radiation Safety Officer
Genesys Regional Medical Center
One Genesys Parkway
Grand Blanc, MI 48439

Dear Dr. Min:

This refers to the letter dated January 22, 2018, signed by Joy M. Finkenbiner, Vice President, Operations, requesting, in part, that we delete the authorization for materials in 10 CFR 35.400, i.e., iodine-125 and palladium-103, from your NRC Material License No. 21-26740-01.

Before we can complete our review of your request, we will need additional information regarding your possession, use and final disposition of these materials, which was not found in your letter above, as follows:

1. If you did not use these authorizations, i.e., you never possessed, used and/or stored this material, tell us that explicitly. Bear in mind that we will corroborate your responses with your inspection and enforcement history in our records.

2. If you did use this authorization, i.e., possess, use and/or store, you must account for it "from cradle to grave." In other words, you have to describe what you used and where (locations of use, areas of use, storage, etc.); prove that there is no residual leakage, if sealed sources were involved, or residual removable contamination; and prove that all remaining materials have either been transferred to another authorized entity or been decayed, if allowed by 10 CFR 35.92, and disposed of.

3. If you have or had any residual sources and if they were transferred or disposed of within 6 months of the source's receipt under your license, you may be able to use the leak test provided by the vendor that accompanied the source initially. If the transfer took place 6 months or more after it was initially received by you, then either a leak test must be performed or confirmatory removable contamination surveys and direct dose rate surveys, in the locations and areas of use and storage. Please use 10 CFR 35.67 to conduct the leak test and 10 CFR 35.2067 to prepare the leak test record to be submitted to us.]

4. 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.

5. 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; and 10 CFR 35.2092.

6. Please do not submit "all" records from the beginning of the licensed authorizations for materials in 10 CFR 35.400 to the present. For example, please only submit the last, or final, records for leak tests, DIS disposal, etc.

7. 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.

8. The following applies only if you had residual sealed sources after your last use of these materials; and, if you do not have appropriate leak tests from those sealed sources anymore (such as the initial tests that came with the sources from the vendor); and, if final disposition took place more than 6 months after receipt of the final sources.

   The final status surveys should consist of: exposure rate measurements to show that all sources of radioactive material have been removed; and, contamination checks (wipe tests) 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; the exposure rate levels and sensitivity anticipated; and the removable contamination levels and sensitivity anticipated.

   e. Background readings and each instruments' efficiency or correction factor.

   f. The date(s) that the survey instrument(s) were last calibrated and the radionuclide(s) each was calibrated with. 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 exposure rate measurements and the action levels and efficiency (cies) for wipe test measurements. 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.

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.

If you have any questions concerning this amendment please contact me at either (630) 829-9841 or (800) 522-3025, ext. 9841. My fax number is 630-515-1078.

Please only send us one complete, written, currently dated and legibly, physically signed (by an appropriate senior management official) correspondence document, such as either an NRC Form 313 or a business-style letter containing the same information as an NRC Form 313a. Please ensure that the requested information is answered completely and accurately.

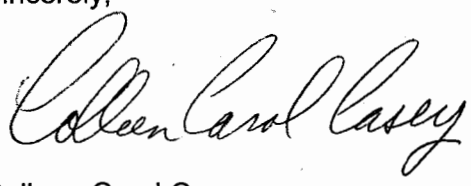
Please do not send multiple copies of responses and please do not submit any information that is identical to what you have already sent us. Please do not email a PDF document to us, and transmit a faxed version, and/or a hard copy sent by mail.

Only one copy transmitted in only one of these ways is appropriate to prevent administrative processing errors.

Please address your written response to my attention as "additional information to control number 602241" to facilitate proper handling in our offices.

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.

Sincerely,



Colleen Carol Casey
Materials Licensing Branch

License No. 21-26740-01
Docket No. 030-34188
Control No. 602241