

From: [Gallagher, Robert](#)
To: [Bryan Harnett <harnett.bryan@gmail.com>](mailto:harnett.bryan@gmail.com) (harnett.bryan@gmail.com)
Subject: FW: Request for Additional Information - Control Number 602130
Date: Thursday, May 17, 2018 12:29:00 PM
Attachments: [image003.png](#)
[image004.png](#)
Importance: High

Dr. Harnett,

The below request for additional information was sent to you on March 28, 2018. To date we have not received a response. If you have submitted a response please resend it to my attention at the email address below. If you have not submitted a response please let me know what the status of your response is. If we do not hear from you by June 1, 2018 we will assume you no longer wish to amend your license and will void the action without prejudice.

Regards,

Robert L. Gallagher
Health Physicist
U.S. NRC, Region I
2100 Renaissance Blvd.
King of Prussia, PA 19406
(610) 337-5182 office
(610) 337-5269 fax



From: Gallagher, Robert
Sent: Wednesday, March 28, 2018 9:13 AM
To: 'Bryan Harnett' <harnett.bryan@gmail.com>
Subject: Request for Additional Information - Control Number 602130

License No. 44-31369-01
Docket No. 03038029
Control No. 602130

Dear Dr. Harnett;

This refers to your request dated December 21, 2017, to amend your license. Your letter states that you would continue to confine the cats for a minimum of 96 hours after treatment but amend the criteria you would use to release the cats to their owners. Your letter included three categories based on dose rate measurements at specified distances.

Categories 2 and 3 in your request will require considerable additional information and consultation with NRC headquarters in the form of a technical assistance request (TAR).

In support of your request to continue confinement for a minimum of 96 hours after treatment and release the cat having a dose rate measurement of 0.25 mr/hr at one foot and with restricted very close contact (Category 1 in your letter) we ask that you provide the following additional information:

1. Please submit the procedure that will be used to accurately measure the dose rate of cats to confirm the dose rate is less than 0.25 mr/hr at a distance of one foot. In addition, please describe the instrumentation that will be used;
2. Please submit the written instructions that will be provided to caretakers of animals administered radioiodine which include how they should restrict very close contact and when isolation may be required. You may find the Sample Instructions found in Appendix D of NUREG-1556 Volume 7, Rev. 1 (February 2018) helpful in preparing your response. The guidance may be found at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>.
3. Please confirm that the only criteria for release that you will use at this time will be 0.25 or 0.5 mr/hr at one foot after holding the cat for 96 hours.

You may provide supporting information in a future request for Criteria 2 and 3 to include the following:

- cats are held not less than 4 complete days [96 hours] after administration
AND
- the dose rate is less than 0.5 mr/hr at one foot with limited interaction and isolation for 1-2 days, later restricted very close contact; or 0.5 mr/hr at one meter with licensee pre-administration acceptance screening, subsequent post-administration licensee evaluations, isolation and very limited human interaction for 2 weeks.
AND
- written instructions are provided to the owners
AND
- the licensee can demonstrate that a member of the public would not receive a dose from the cat that will exceed 0.02 mSv [0.002 rem or 2 mrem] in any one hour or 1 mSv [0.1 rem or 100 mrem] in a year (the limits of 10 CFR 20.1301).

Please respond by email to acknowledge that you have received the email request for additional information. If you have any questions you may contact Robert Gallagher at (610) 337-5182, or by email at Robert.gallagher@nrc.gov.

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