

October 9, 2019

Sara A. Forster, Health Physicist Licensing Reviewer
 U.S. Nuclear Regulatory Commission, Region III
 2443 Warrenville Road, Suite 210
 Lisle, IL 60532-4352

Re: Response to NRC RAM License Amendment 13-35179-03; Increase Possession Limits and Addition of New Isotopes for Possession

Dear Ms. Forster,

This letter is in response to an email sent by you on October 4, 2019, referring to a request by Zevacor to increase possession limits to current isotopes and to add additional isotopes for possession on NRC RAM License 13-35179-03.

After review of your email and the previous license amendment request, it has been determined that the request for the three new rubidium radionuclides with the form of "any" was done in error.

Please see the revised list of requested isotopes and possession limits to be added the NRC RAM License 13-35179-03:

| 6. Byproduct, source, and/or special nuclear material | 7. Chemical and/or physical form | 8. Maximum amount that licensee may possess at any one time under this license | 9. Authorized Use |
|---|----------------------------------|--|---|
| Rubidium-83 | Incidentally Activated Products | 250 Curies | For possession and storage of byproduct materials incidental to radionuclide production |
| Rubidium-84 | Incidentally Activated Products | 150 Curies | For possession and storage of byproduct materials incidental to radionuclide production |
| Rubidium-86 | Incidentally Activated Products | 50 Curies | For possession and storage of byproduct materials incidental to radionuclide production |

To be clear, Zevacor still requests the isotopes, chemical/physical form, possession limit, and authorized use of all of the isotopes in the letter dated August 9, 2019. The above table is just a revised table to correct the error mentioned above.

Zevacor confirms all license conditions and commitments.

If you have any questions regarding the submission, please contact me at the information provided below.

Sincerely,



Matthew Trusner
 Radiation Safety Officer
 Zevacor Molecular
 (M) 217-433-7902
 mtrusner@zevacor.com

Song, Taehoon

From: Forster, Sara
Sent: Wednesday, October 09, 2019 1:11 PM
To: Song, Taehoon; Pavon, Sandy
Cc: Tomczak, Tammy
Subject: FW: Re: {External} Additional Information Request re Zevacor Molecular, NRC License No. 13-35179-03, CN613836
Attachments: 191009 - Response to NRC about Isotopes and Possession Limits.pdf

Good afternoon, Tae and Sandy...

Could you please scan in the attached document and return to me? It is additional information to the referenced action.

Thank you,

Sara

From: Matthew Trusner <mtrusner@zevacor.com>
Sent: Wednesday, October 09, 2019 9:55 AM
To: Forster, Sara <Sara.Forster@nrc.gov>
Subject: [External_Sender] Re: {External} Additional Information Request re Zevacor Molecular, NRC License No. 13-35179-03, CN613836

Ms. Forster,

Please see the attached letter in response to your email.

If you have any questions, please don't hesitate to contact me.

Thank You,
Matthew Trusner
RSO
Zevacor Molecular

From: Forster, Sara <Sara.Forster@nrc.gov>
Sent: Friday, October 4, 2019 2:26 PM
To: Matthew Trusner <mtrusner@zevacor.com>
Subject: {External} Additional Information Request re Zevacor Molecular, NRC License No. 13-35179-03, CN613836

Warning. This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Trusner:

Our office has reviewed your August 8, 2019 letter (ML19221B634) requesting authorizations for several increased possession limits, as well as for three additional rubidium radionuclides, under the license. Please note that additional information is needed to complete our review. Accordingly, we have attempted to contact

you both at the cell phone number provided in your letter and at the toll-free number on file at NRC and listed at the licensee's public website. We were unable to reach you by phone. Accordingly, we are sending this email request to please respond to the question:

We have noted that the authorized use requested for the three new rubidium radionuclides is, "for possession and storage of byproduct materials incidental to radionuclide production." However, the requested form is "any" rather than "incidentally activated products." Please either:

- **Revise the form for the three requested radionuclides to explain why "any" form is needed; or**
- **Expand upon your description of authorized use of the material, including chemical and physical forms that will be used under the license, to better clarify why the form "any" is needed.**

Please provide the requested information within 14 days of this message (on or before October 18, 2019). Include a signed and dated cover letter transmitting your resubmitted application. Submission of your response as a pdf file attached to an email or via facsimile will allow for the quickest processing. Please call or email me with any questions you may have, or if you are unable to respond by the date suggested above. Please also contact me as soon as possible to let me know that you have received this message and are working on a response.

Please do not hesitate to contact me if you have any questions concerning this message.

Sincerely yours,

Sara A. Forster, Health Physicist Licensing Reviewer
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