

From: [Torres, Roberto](#)
To: mfernald@wyomingmedicalcenter.org
Subject: NRC request for additional information
Date: Tuesday, April 07, 2020 3:05:00 PM
Attachments: [NRC request for additional information.pdf](#)

Mr. Fernald:

Attached is NRC letter requesting additional information in support of renewal application for NRC license 49-29379-01.

Thank you for your cooperation.

Roberto J. Torres, M.S.
Senior Health Physicist
U.S. Nuclear Regulatory Commission, Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511
817-200-1189



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E. LAMAR BLVD
ARLINGTON TX 76011-4511

April 7, 2020

Michael Fernald, M.S.
Radiation Safety Officer
Wyoming Medical Center, Inc.
Wyoming Medical Center-East Campus
6550 East Second Street
Casper, WY 82609
(Via email)

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Mr. Fernald:

The U.S. Nuclear Regulatory Commission (NRC) has completed the technical review of the renewal application of NRC license number 49-29379-01 and additional information is needed. Please provide your response in a signed and dated letter (pdf file) by reply email to roberto.j.torres@nrc.gov.

1. Provide NRC Form 313 signed and dated by licensee senior management who can make legally binding commitments on behalf the licensee. Correct the information in Item 3 of NRC Form 313 if needed (see next item).
2. Condition 10 of the license states that licensed material may be used or stored at 6600 East 2nd Street, Casper, Wyoming, while Item 3 of NRC Form 313 states 6550 East Second Street, Casper, Wyoming. Explain the discrepancy, provide correct use or storage address and confirm that areas of use or storage have not changed.
3. The renewal application did not request the use of 10 CFR 31.11 material while the renewal application requested that several authorized users be listed for 31.11 use. Provide the information listed below or indicate that 31.11 material to be used will not exceed the quantities listed in 10 CFR 31.11.

<input type="checkbox"/> Any byproduct material listed under 10 CFR 31.11 when activity exceeds the quantity listed in 10 CFR 31.11	Prepackaged kits	___mCi	<i>In vitro</i> studies.
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4. Provide the information listed below or indicate that all 10 CFR 35.65 material to be used will not exceed the quantities listed in 10 CFR 35.65 (not to exceed 30 millicuries for each individual sealed source).

<input type="checkbox"/> Any radionuclide in excess of 30 mCi for use in calibration, transmission, and reference sources. List radionuclide:	Sealed source (Manufacturer _____, Model No.)	___ mCi	For use in a Manufacturer _____, Model No. _____ for calibrations and checking of licensee's survey instruments.
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5. Condition 12.B. lists Wesley W. Hiser, M.D., as a 35.200 authorized user while the renewal application did not request that this authorized user be listed in the renewed license. Confirm that Dr. Hiser needs to be removed in the renewed license.
6. Provide the following information for a consultant or contractor radiation safety officer or confirm that Michael Fernald is an employee of the licensee (Wyoming Medical Center, Inc, Wyoming Medical Center-East Campus).

<input type="checkbox"/> For a proposed RSO who is an outside consultant or contractor, address the following: <input type="checkbox"/> An outside consultant or contractor must qualify as an RSO in accordance with 10 CFR 35.50 or 10 CFR 35.57 and 10 CFR 35.59 criteria specified above.

<input type="checkbox"/> Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of onsite time (hours per week or days per quarter, as appropriate for the program). <p style="text-align: center;">AND</p> <input type="checkbox"/> Identify an in-house representative who will serve as the point of contact during the RSO's absence. <p style="text-align: center;">AND</p> <input type="checkbox"/> Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of the radiation safety program and related regulatory requirements. <p style="text-align: center;">AND</p> <input type="checkbox"/> Specify the maximum amount of time it will take the consultant-RSO to arrive at the facility in the event of an emergency that requires his/her presence.
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7. The renewal application requests that several authorized users for medical use be also authorized for non-medical use (Gd-153 sealed sources authorized under 10 CFR 35.65 for calibration and/or quality control testing of a gamma camera). Six of the individuals being requested to be named as non-medical use for Gd-153 in the renewed license are already listed as non-medical use for Gd-153 in NRC license 49-00152-02 (Amendment 93 dated June 27, 2019) and no additional training and experience documentation is

needed. However, two of the individuals being requested to be named as non-medical use for Gd-153 in the renewed license are not listed as such in an NRC license. Provide training and experience information for Seth H. Iverson, M.D., and Charles W. Bowkley, M.D. as indicated below.

Item 7: Individuals Authorized for Non-Medical Use:

Name of the proposed nonmedical use AU:

- Attach a description of types, quantities, and proposed nonmedical uses for each individual requested.

AND

- Attach documentation of individual's education and radiation safety training and experience with the types of materials and uses requested. This may include the NRC license number or a copy of the Agreement State license, permit issued by an NRC master materials licensee, permit issued by an NRC or Agreement State broad scope licensee, or permit issued by an NRC Master Materials License broad scope permittee on which the individual was specifically named.

AND

- Attach detailed radiation training and experience applicable to the use requested.

8. Provide the following information (commitment) that was left unmarked in the renewal application.

Item 8: Training for Individuals Working In or Frequenting Restricted Areas

Provide the following:

- A statement that, "We have developed and will implement and maintain written procedures for a program for training required under 10 CFR 19.12 for each group of workers, including (i) topics covered, (ii) qualifications of the instructors, (iii) method of training, (iv) method for assessing the success of the training, (v) initial training, and annual refresher training."

9. The facility diagram submitted with the renewal applicable is illegible. Provide legible diagram that contains the following information for areas of storage and use, and adjacent areas. Include the area dedicated stress test room with treadmill as identified in NRC inspection report dated February 28, 2019.

Item 9: Facility Diagram

- Provide the following:
- Facility diagrams. Drawings should be to scale, and the scale used should be indicated. The direction of north should be indicated.
- Identify in the diagram location, room numbers, and principal use of each room, including patient treatment rooms or area where byproduct material is prepared, used, and stored.
- Identify in the diagram principal use of adjacent rooms (e.g., office, file, toilet, closet, hallway), including areas above, beside, and below therapy treatment rooms.

10. Provide the following information (commitment) that was left unmarked in the renewal application.

Item 11: Waste Management

Provide the following:

- A statement that: "We have developed and will implement and maintain written waste disposal procedures for licensed material in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of 10 CFR Part 20, Subpart K, and of 10 CFR 35.92."

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 document system (ADAMS). ADAMS is accessible from the NRC Web site at www.nrc.gov/reading-rm/adams.html.

Thank you for your cooperation.

Sincerely,

Roberto J. Torres

Digitally signed by Roberto J.
Torres
Date: 2020.04.07 15:02:06 -05'00'

Roberto J. Torres, M.S., Senior Health Physicist
Materials Licensing and Decommissioning Branch

Docket: 030-38218
License: 49-29379-01
Control: 618415

Enclosure: As stated