



### CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU		DATE OF CONTACT	TYPE OF CONVERSATION	
James Botti		03/06/2020	<input type="checkbox"/> E-MAIL	<input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS	TELEPHONE NUMBER		<input checked="" type="checkbox"/> TELEPHONE	
jbotti@mpcphysics.com		734-662-3197		
ORGANIZATION	DOCKET NUMBER(S)			
MPC Physics	030-38146			
LICENSE NAME AND NUMBER(S)	MAIL CONTROL NUMBER(S)			
Advanced PET Imaging Network	616947			
SUBJECT				
Pending NRC License Renewal - Additional Information Required				
SUMMARY AND ACTION REQUIRED (IF ANY)				
<p>This is a summary of the conversation between Laura Cender and James Botti of MPC Physics on behalf of Advanced PET Imaging Network regarding the license renewal request dated October 30, 2019.</p> <p>Per our discussion today, additional information is required to continue processing your submitted renewal request. Please address each of the following items and provide your response by no later than Friday, April 3, 2020.</p> <p>1. Consultant Radiation Safety Officer:</p> <ul style="list-style-type: none"> <li>a.) 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 size of the program).</li> <li>b.) Identify an in-house representative who will serve as the point of contact during the RSO's absence.</li> <li>c.) 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.</li> <li>d.) 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 or her presence.</li> </ul>				
NAME OF PERSON DOCUMENTING CONVERSATION				
Laura B. Cender				
SIGNATURE				DATE OF SIGNATURE
<i>Laura B. Cender</i>				03/06/2020

**CONVERSATION RECORD (continued)**

LICENSE NAME AND NUMBER(S)

Advanced PET Imaging Network

MAIL CONTROL NUMBER(S)

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**SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)**

**2.) Facilities and Equipment**

- a.) Please resubmit the facility diagrams as the diagrams provided are too small read.
- b.) State the number of mobile trailers possessed under the license and please confirm that all trailers have the same facility layout.
- c.) Please provide a simple and complete shielding calculation, to demonstrate that radiation levels in all adjacent areas, including above, the proposed renovated imaging room and will not exceed the levels permitted in 10 CFR 35.1301 for members of the public and radiation workers. Please show your work, define calculation inputs, and explain any assumptions made.

Please clearly indicate all points for which dose levels are calculated with points on the facility diagram so corroboration of independent calculations is possible.

In preparing your calculations please ensure that all of the following parameters are clearly defined:

- Radioisotopes used (ex. F-18)
- Maximum activity administered per patient treatment (mCi)
- Maximum number of patient treatments per day
- Duration of scan times in minutes
- Number of days per week patient treatments are performed.
- Occupancy factors for surrounding areas
- Shielding type and thickness of material for each barrier

Note that shielding calculations were referenced in the application, but not provided.

- d.) Please describe any equipment used for handling of PET isotopes, such as remote handling equipment, shielded storage containers, automatic dispensing systems, or other equipment used to reduce exposure.

**3. Emergency Procedures**

- a.) Provide a statement confirming that emergency procedures will be developed, implemented, and maintained in accordance with the radiation safety program as required by 10 CFR 20.1101. Emergency procedures should address transportation scenarios including vehicular accidents as described in Appendix V of NUREG 1556 Vol. 9 Rev. 3.

**4. Transportation**

- a.) Provide a statement confirming that the licensee will develop, document, and implement procedures to assure the following:
  - i.) Radioactive material is transported in accordance with 49 CFR Parts 171 -177, "Transportation."  
Procedures will include:
    - use of approved packages
    - use of approved labeling
    - conduct of proper surveys
    - complete and accurate shipping papers
    - bracing of packages
    - security provisions
    - written emergency instructions

**CONVERSATION RECORD (continued)**

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**SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)**

**4. Transportation (cont.)**

- ii.) Management (or management's designee) will perform audits, at least annually, of transportation documentation (e.g., shipping papers and survey reports) and activities at client facilities.
  - iii.) Licensed material is secured during transport and use at the client's facilities.
  - iv.) Radioactive waste is handled properly during transport. Describe the method of storage and final disposal.
  - v.) The transport vehicle, including the driver's compartment, if separate, will be secured at all times from any unauthorized access when the vehicle is unattended.
- b.) Provide a statement confirming that drivers and technologists (or therapists) will be properly trained in applicable transportation regulations and emergency procedures, in addition to the training requirements of 10 CFR 19.12 and 10 CFR 35.27. The training for these individuals will include, at a minimum, DOT regulations, shielding, as low as is reasonably achievable (ALARA), basic radiation protection, and emergency response.

**From:** [Cender, Laura](#)  
**To:** [Jim Botti](#)  
**Subject:** Advanced PET Imaging Network NRC License Renewal - Additional Information Requested  
**Date:** Friday, March 06, 2020 3:09:00 PM  
**Attachments:** [Conversation Record to Advanced PET Imaging Network 3.6.2020.pdf](#)

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Hello James,

Thank you for taking time out of your afternoon to discuss the pending NRC license renewal for Advanced PET Imaging Network, NRC License No. 21-32763-01. As we discussed today, a record of our conversation detailing the additional information required is attached.

Please submit your signed and dated response by no later than Friday, April 3, 2020. Please feel free to contact me at 630-829-9712 or send me an email if you have any questions.

Thank you,  
Laura Cender

Laura Cender  
U.S. Nuclear Regulatory Commission  
Materials Licensing Branch  
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