

From: [Elliott, Robin](#)
To: byerly@uchc.edu; kevin.higgins@uchc.edu
Cc: dennis.stroud@versantphysics.com
Subject: Request for Amendment to License No. 06-13022-02, CN 618491
Date: Thursday, April 23, 2020 10:31:00 AM

License No.: 06-13022-02

Docket No: 030-01295

Control No: 618491

Licensee Name: UConn Health

This refers to your request to amend your license dated March 20, 2020. In order to continue our review of your request, the following additional information is needed:

1. Please have Wesley G. Byerly, Pharm. D., review the email amendment request dated March 20, 2020, and have him state that he supports the request submitted by Mr. Stroud on behalf of UConn Health.
2. Please provide current contact information for Arthur Higgins and James Fomenko: business email, phone and fax number if available.
3. Regarding the documentation submitted to support Arthur Higgins as Radiation Safety Officer (RSO):
 - a. Please provide documentation of your Bachelor of Science degree in mechanical engineering from University of Rhode Island.
 - b. The 313A (RSO) Table 5(a):
 - i. did not include training relative to Radiation Dosimetry. Please provide documentation of required training in this area.
 - ii. references 60 hours of classroom and laboratory training from Northeast Utilities which appears as a job listing on your resume. Please clarify how this classroom and laboratory training was provided. If you have an outline or syllabus, please provide it.
 - iii. references 165 hours of classroom and laboratory training from John Patrick University of Health and Applied Sciences, which does not appear on your resume. Please provide a course completion certificate and a training outline or syllabus for the coursework.
 - c. The 313A (RSO) Table 5(c) did not include training relative to Ra-223 Xofigo under 35.300. Please provide documentation to address this area.
 - d. Section 8.7.1 of NUREG 1556 Vol 5 Rev. 1, Program Specific Guidance About Self Shielded Irradiator Licenses, (which can be located here: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v5/>) provides licensees guidance regarding information to be provided regarding training for Radiation Safety Officers. In specific, Appendix F outlines the training that RSOs need to obtain prior to being authorized on the license. Please provide documentation that addresses the topics listed in Appendix F.
 - e. Section 8.7.3 of NUREG 1556 Vol 11 Rev. 1, Program Specific Guidance About Licenses of Broad Scope, which can be located here: (<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v11/>) provides licensees guidance regarding information to be included in license applications regarding training for Radiation Safety Officers. As per this section, please provide the following:
 - i. Describe the training for the proposed RSO that demonstrates the individual is qualified to perform duties required under the license.
 - ii. Address the RSO's experience in performing each of the duties listed in

the “Duties and Responsibilities” section, when and where the experience was gained and the type, form, and quantity of radionuclides involved.

iii. Submit a statement delineating the RSO’s duties and responsibilities.

4. The 313A (RSO) for Arthur Higgins did not include authorization for 10 CFR 35.400 uses; however, the 313A (ARSO) submitted for James Fomenko requests 10 CFR 35.400 uses. A review of your recent inspection history did not indicate that 10 CFR 35.400 uses were active and that they may not have occurred since 2011. Please provide the following:
 - a. What is the status of the 10 CFR 35.400 program?
 - b. If the program is not active, please indicate when Mr. Fomenko last supervised this program. If it was longer than seven years, please provide recentness of training documentation.
 - c. If the program is active, please provide documentation of training in radiation safety, regulatory issues, and emergency procedures for 10 CFR 35.400 uses for Mr. Higgins.

Your reply must be an originally signed (by Dr. Byerly) and dated letter. The letter may be scanned and submitted as a pdf document attached to an email (preferred method during this mandatory telework period); or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your amendment request. Please feel free to call or email me with any questions or concerns you may have.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

Regards,

Robin L. Elliott

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