

From: [Tran, Frank](#)
To: ["bcaudle@mpcphysics.com"](mailto:bcaudle@mpcphysics.com)
Subject: Request for additional information for NRC License No. 13-32273-01
Date: Friday, January 08, 2021 8:28:00 PM

Dear Mr. Caudle:

We have reviewed the renewal application for NRC License No. 13-32273-01 for Unity Healthcare, LLC d/b/a Innervision Advanced Medical Imaging Center in accordance with the NRC regulations, guidance, and policies, including but not limited to NUREG-1556, Volumes 9 and 20. Based on NUREG-1556, Volume 9, Revision 3 (<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v9/index.html>), we will need the following information to complete our review; some information are needed to confirm our understandings.

1. The licensee requests that 10 CFR 35.300 material will be used. Based on Section 8.9.1, if in-patient rooms will be provided for patients treated with 10 CFR 35.300 material, provide the diagram of the rooms and radiation shielding calculations with the most conservative assumptions for each room, including information about the type, thickness, and density of any necessary shielding to enable independent verification of shielding calculations, and a description of any portable shields, if used. The calculations should include the workload assumptions used. If there will be no in-patient rooms provided, please state.
2. The licensee requests to use PET isotopes as permitted by 10 CFR 35.200. Based on Section 8.9.1, please provide the description of the shielding and the shielding calculation for each room where PET isotopes will be used, including information about the type, thickness, and density of any necessary shielding, and a description of any portable shields, if used. For your reference, AAPM Task Group 108, "PET and PET/CT Shielding Requirements," provides guidance on how to design a PET facility and perform associated shielding calculations. In addition, please indicate if the adjacent areas to the PET used are restricted or unrestricted. Definition of the restricted area is in 10 CFR 20.1003. Describe the additional equipment for working with PET isotopes (i.e., the use of tungsten syringe shields, tongs, or automatic dispensing systems to reduce exposure).

Note: If applicants are proposing to use portable shielding to protect health and minimize danger to life or property, the applicants should describe the alternative equipment and administrative procedures they propose to use for evaluation and approval by the NRC. If applicants elect to use portable shielding, they should commit to having administrative procedures to control configuration management to maintain dose within regulatory limits.

3. Peter M. Simmons, M.D. is currently authorized for 10 CFR 35.100, 35.200, and 35.300 (limited to oral administration of sodium iodide I-131 and parenteral administration of any beta emitter, or photon-emitting radionuclide with photon energy less than 150 keV). If there is no changes to his current authorization, please state. Please note that the requirement in 10 CFR 35.390 is not equivalent to 10 CFR

35.392, 35.394 and 35.396.

4. Based on Section 8.9.3, please provide a brief description of the equipment used to measure the dosages. If unit dosages will be used, please state.

Please provide the response in writing with authorized signature and date by February 5, 2021. To facilitate proper mailing handling in our office, please reference Mail Control No. 623178 in the cover letter. If you have any questions or need a clarification, please do not hesitate to contact me at 630-829-9623 or reply to this email.

Thank you,

Frank Tran

Health Physicist/License Reviewer
NRC Region III/Division of Nuclear Materials Safety
Phone: 630-829-9623
Fax: 630-515-1078
Email: Frank.Tran@nrc.gov

