



SILVER VALLEY VETERINARY CLINIC

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March 24, 2021

Michelle Hammond
Health Physicist
Materials Licensing and Decommissioning Branch
Region IV-Division of Nuclear Materials and Safety

Licensee Name : BRP Veterinary
Silver Valley
License Number : 11-35625-01
Docket Number : 030-39260
Mail Control Number: 624360

Ms. Hammond,

This letter is an updated response to your email on March 3, 2021 and addresses each of your numbered inquiries below.

1. We retract the request to have Dr. Hass serve as the RSO. Instead, Dr. Matthew Arno will serve as the RSO. Dr. Arno is currently the RSO on Texas License L07061, a copy of which is attached. Note that in Texas veterinary use of Sn-117m is covered under 25 TAC 289.256(kk), the Texas equivalent of 10 CFR 35.300. In accordance with the standard Texas, and NRC, format for such licenses, individual radionuclides are not listed since generic authorization for all uses in that category are issued. In this instance, the activities performed under 25 TAC 289.256(kk) for License L07061 consist of Sn-117 treatments and I-131 therapy.
2. As stated in Item 7 of the NRC Form 313 Supplement in the initial application, Dr. Hass will be the authorized user.
3. The original submittal contained a training certificate for Dr. Hass for the 2019 Nuclear Medicine Short Course offered at Texas A&M. In addition, Dr. Hass has completed training offered by FX Masse designed for general veterinary use of radioactive material and also specifically for use of Sn-117m. A copy of that certificate is attached. To augment her training with hands-on experience, the following actions will be taken:
 - The initial receipt of material and the first three cases will be conducted under the direct supervision of the RSO, Dr. Arno.
 - The on-the-job training will include:
 - Observing authorized personnel perform licensed activities, including receipt and administration of radioactive material to the animal, using survey equipment, proper contamination control techniques, and proper methods for disposal of radioactive material.
 - Performing licensed activities with animals under the supervision of, and in the physical presence of, an individual authorized to handle animals treated with licensed material or otherwise containing licensed material. Activities should include the administration of radioactive material to the animal, using survey

equipment, proper contamination control techniques, and proper methods for disposal of radioactive material.

4. The RSO will be responsible for ensuring that all technical personnel will be adequately trained in proper radiation safety procedures and in the handling and care of veterinary patients injected with radiopharmaceuticals. All technologists will receive a minimum of 8 hours of online or classroom training covering the basics of radiation and radiation safety. The subject to be covered are listed below. In addition, an authorized user will be available to supervise all nuclear medicine procedures. Documentation of technician and veterinarian training will be available for review.

- Basics of radioactive material
- Radiation interactions
- Radiation detection and measurement
- Radiation biology
- Shielding, dosimetry, and radiation protection
- Radiation surveys
- Patient release procedures
- Waste management
- DOT shipping requirements (as required)

In addition to the classroom/online training, the RSO will observe the trainee perform their job duties that involve licensed activities with animals, including using survey equipment, proper contamination control techniques, and proper methods for disposal of radioactive material and confirm they have sufficient training and experience.

5. Dogs that have been treated will be kenneled in the yellow highlighted area on the attached figure. Treated dogs will be kenneled in separate cages from other animals. Dogs that have not been treated may also be kenneled in this area but in separate cages. Since Sn-117m is not excreted, contamination spread is not a concern.

Prior to administration, radioactive material will be kept in the “RAM room” on the figure in the initial application and stored in a locked cabinet to prevent unauthorized access.

6. As stated in Item 11 of the NRC Form 313 Supplement in the initial application, we will use the model waste procedures that are published in Appendix P in NUREG-1556, Volume 7, Revision 1, ‘Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope.
7. As stated in Item 10 of the NRC Form 313 Supplement in the initial application, we will survey our facility and maintain contamination levels, including contamination control, in accordance with the survey frequencies and contamination levels published in Appendix M in NUREG-1556, Volume 7, Revision 1, ‘Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope.

8. We will use instruments that meet the radiation monitoring instrument specifications published in Appendix I in NUREG-1556, Volume 7, Revision 1, 'Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope.'
9. We confirm that instruments will be calibrated before first use, at least annually thereafter, and after any repair, by a vendor that the NRC or an Agreement State has licensed to perform instrument calibration.
10. Pursuant to 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g) and 10 CFR 70.51(b) (3), as appropriate, we will maintain records important to decommissioning and transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned, in accordance with 10 CFR 30.34(b), 10 CFR 40.46, and 10 CFR 70.36, as appropriate. Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), and 10 CFR 70.51(a)(3), as appropriate, prior to license termination, we will forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), as appropriate, to the appropriate NRC Regional Office.

Sincerely,



Dr. Jamie Hass, DVM, PhD