



Magdalena R. Grylak  
US Nuclear Regulatory Commission  
Region III  
Materials Licensing Branch  
2443 Warrenville Rd. Suite 210  
Lisle, Illinois 60532-4351  
Via Fax: (630) 515-1078

April 29, 2021

Licensee: Covance Laboratories, Inc.

Address: 655 Fairfield Court, Ann Arbor, MI 48108

License #: 21-32816-01, Amendment #16

**Action: Response to Additional Information Requested for Renewal of License**

Dear Ms. Grylak,

As requested, below please find our responses to the additional information regarding consultant RSOs requested on page 8-25 of NUREG-1556, Vol. 7, Rev. 3:

- 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).

**In addition to Covance, I also serve as RSO for the following licensees in Georgia, which are all fairly large medical centers with specific licenses:**

- 1. Grady Memorial Hospital**
  - a. License number: GA 258-2
  - b. Location: Atlanta, GA
  - c. Scope of activities: 10 CFR 35.100, 35.200, 35.300, 35.400, 35.500, Ir-192 for high dose rate brachytherapy (HDR), I-125 for radioactive seed localization (RSL), Y-90 microspheres, Cs-131 GammaTiles for permanent brachytherapy
- 2. Piedmont Hospital**
  - a. License number: GA 292-1
  - b. Location: Atlanta, GA
  - c. Scope of activities: 35.100, 35.200, 35.300, Y-90 microspheres, I-125 for RSL, Pd-103 for RSL
  - d. Note: This client is also licensed for other therapy activities, but these are covered by a second RSO listed separately on the license who is a therapy medical physicist.
- 3. Piedmont Henry Hospital**

- a. License number: GA 710-1
  - b. Location: Stockbridge, GA
  - c. Scope of activities: 35.100, 35.200, 35.300, Y-90 microspheres
  - d. Note: This client is also licensed for other therapy activities, but these are covered by a second RSO listed separately on the license who is a therapy medical physicist.
4. Piedmont Fayette Hospital
- a. License number: GA 1340-1
  - b. Location: Fayetteville, GA
  - c. Scope of activities: 35.100, 35.200, 35.300, Y-90 microspheres, I-125 for RSL, Pd-103 for RSL
  - d. Note: This client is also licensed for other therapy activities, but these are covered by a second RSO listed separately on the license who is a therapy medical physicist.

I'm also pending addition as RSO for two other Piedmont hospitals in Georgia, but have not been added to their licenses yet.

The typical minimum amount of onsite time I spend at Covance is one day per quarter.

Since Covance's license is not a difficult one to maintain, I allocate time to perform RSO duties for them around my other RSO commitments listed above, in addition to my other commitments as a diagnostic medical physicist performing quality control on imaging equipment. During the time I have been Covance's RSO, this has not posed a problem.

- Identify an in-house representative who will serve as the point of contact during the RSO's absence.

The points of contact in my absence are the Authorized Users. Currently, they are Sarah Krueger and Akhila Kuda-Wedagedara. If the AUs change, the on-site contacts will likewise change.

- 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.

I respond to emails typically within 24 hours, and to calls within 1 hour. These times are slightly increased if I happen to be on vacation, but my employer, West Physics, also has several other experienced health physicists available to answer questions should I be unavailable for extended periods.

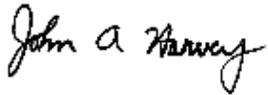
- Specify the maximum amount of time it will take the consultant RSO to arrive at the facility, in the event of an emergency that requires his or her presence.

It would take approximately 12 hours for me to drive to Ann Arbor from my permanent location in metro Atlanta. I could also fly, and make it there in as little as 6 hours should there be a suitable flight available. Given the scope of their use, I don't anticipate an emergency significant enough to require

**my immediate presence. West Physics also has other health physicists available in our Chicago field office who could be there in as little as 4 hours.**

If any additional information is required, please contact me at [john.harvey@westphysics.com](mailto:john.harvey@westphysics.com) or (734) 678-7309.

Sincerely,

Handwritten signature of John A. Harvey in black ink.

John Harvey  
Radiation Safety Officer, Covance Laboratories, Inc., Ann Arbor  
Chief Medical & Health Physicist, West Physics

The management of Covance Laboratories, Inc. is aware of our consultant-RSO's responsibilities, and agree that he has been and will continue to be an effective RSO for us in addition to his other job duties.

Handwritten signature of Allison L. Jones in black ink.

Allison L Jones  
EHS Associate Director, US Early Development  
Covance, Inc.