

From: [Seeley, Shawn](#)
To: [Ribaldo, Cathy \(NIH/OD/ORS\) \[E\]](#)
Subject: Request for Additional Information MC
Date: Friday, March 19, 2021 11:51:00 AM

Cathy,

This is in response to your letter dated March 5, 2021, requesting a waiver from the requirements of 10 CFR 35.652(a). Specifically, you are looking to waive the requirement to calculate and retain on file the average dose rate around the remote afterloader unit while the source is in the shielded or “off” position. In order to complete our review, please submit the additional information.

1. Your letter states that the Elekta field rep routinely takes the readings around the device but only documents the maximum reading attained while the source is in the shielded position. Please submit additional justification why the field rep’s readings can’t be utilized to make the required calculation and thus remain compliant with the regulations.
2. Your letter further states that the field rep could document the readings he measures from all sides in the remarks section, but the medical physicist is unwilling to “alter” the signed form. Please submit additional justification and reasoning why the medical physicist can’t produce his own document with the required average dose rate to maintain compliance with the regulations.

Please submit your response within 30 days so we may timely address your amendment request. Please let me know if you have any questions or require additional information on how to move forward.

Shawn

Shawn W. Seeley, Health Physicist
USNRC
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
610-337-5102 (o); 610-337-5269 (f)
Shawn.seeley@nrc.gov