

**From:** [Nguyen, Jan](#)  
**To:** [Lon Wilson](#)  
**Subject:** NRC Request for Additional Information for CDL Nuclear Technologies, Inc. (Mail Control Number 625559)  
**Date:** Monday, June 07, 2021 5:55:00 PM

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Licensee: CDL Nuclear Technologies, Inc.  
License No: 37-30120-01  
Docket No: 030-33422  
Control No: 625559

Dear Mr. Wilson,

**Could you please reply back to this email to confirm receipt?**

This is in reference to your letter dated April 20, 2021, requesting to amend Nuclear Regulatory Commission License No. 37-30120-01. In order to continue our review, we need the following additional information:

1. Please confirm that James E. Van Zandt VA Medical Center, 2907 Pleasant Valley Boulevard, Altoona, PA, is an area of exclusive federal jurisdiction. In addition, please confirm that James E. Van Zandt VA Medical Center does not have a permit for radioactive material use at that location.
2. Please confirm that no PET studies will be conducted at James E. Van Zandt VA Medical Center, 2907 Pleasant Valley Boulevard, Altoona, PA.
3. Please provide a description of the instrumentation (e.g., gamma counter, solid-state detector, portable or stationary count-rate meter, portable or stationary dose-rate or exposure-rate meter, single or multichannel analyzer, liquid scintillation counter, proportional counter) that will be used to perform required surveys at James E. Van Zandt VA Medical Center.
4. Please provide a description of the equipment used to measure the dosages at James E. Van Zandt VA Medical Center. Alternatively, you may confirm that you are only using unit dosages and will determine activity by decay correction.
5. Please describe the scope of activities that will be performed at James E. Van Zandt VA Medical Center (i.e., base hot lab, patient imaging, etc.). Specifically, will this be a base site (a location where mobile operations are run out of), or a fixed site (where licensed materials remain on-site for use and storage)? Will you perform mobile operations out of James E. Van Zandt VA Medical Center, or will all mobile operations continue to be performed out of the Pittsburgh base location?
6. Please describe how byproduct material is delivered to James E. Van Zandt VA Medical Center. Please include how it is received and handled (i.e., Are materials delivered directly to James E. Van Zandt VA Medical Center, or to the base location in Pittsburgh, and then taken to James E. Van Zandt VA Medical Center?).

7. Please confirm you are leasing the space at James E. Van Zandt VA Medical Center. If you are leasing the space and the location of use will be controlled by an entity other than CDL, please provide documentation of a clear, contractual agreement concerning access to your location of use for the purpose of decontamination or removal of licensed material from the location of use in the event of disharmony between you and the owner entity. This documentation should consist of signed certification from both parties, and should also address the permitted use of byproduct material at the client's address and the authority and responsibilities of the mobile service provider and the client.
8. Please confirm that you will have full responsibility over the site, in order to ensure compliance with all applicable regulatory requirements.
9. Please describe the controls (e.g., control of keys, badge access) that will be implemented to ensure that licensed materials are under CDL's control and not accessible to unauthorized individuals (i.e. hospital staff). Furthermore, will non-licensee staff have unescorted access to the licensed areas of use or will CDL have control of these areas?
10. Please indicate if all byproduct material, including radiopharmaceuticals, sealed sources, and all associated wastes, will remain and be secured in the James E. Van Zandt VA Medical Center hot lab at the end of the day.
11. Please confirm that instructions will be given to supervised individuals in written radiation protection procedures, regulations, and license conditions with respect to the use of byproduct material in accordance with 10 CFR 35.27, in addition to the requirements in 10 CFR 19.12.
12. Please indicate the typical response times of the Radiation Safety Officer (RSO) and authorized user (AU) to James E. Van Zandt VA Medical Center in the event of an incident.

We will continue our review upon receipt of the requested information. You may respond to my attention in writing by letter, email (if letter is signed by senior management and scanned into a pdf format), or fax (610-337-5269), referencing mail control number 625559. Please submit a reply within 30 days. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5006.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits**, see our **toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

Thank you in advance for your help!

*Jan*

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