

From: [David Theel](#)
To: [Torres, Roberto](#)
Subject: [External_Sender] Re: NRC request for additional information
Date: Wednesday, June 16, 2021 10:45:03 AM
Attachments: [02 NRC Request for Info.pdf](#)

Mr. Torres,

Please find attached the response to your request for additional information. Thank you for your review of the submitted materials and your assistance in making our program as compliant as possible.

Please feel free to reach out to me via email or the phone number listed below.

Thank you,
David Theel, DABR
Radiation Safety Officer
208-221-8322

From: Torres, Roberto <RobertoJ.Torres@nrc.gov>
Sent: Wednesday, June 16, 2021 6:32 AM
To: David Theel
Subject: [External Email] NRC request for additional information

Mr. Theel:

Thank you for your response letter dated June 15, 2021. A few items are still pending. Please provide your response in a signed and dated letter (in pdf format) by reply email.

Provide the following commitments.

1. "Mountain View Hospital commits to develop, implement and maintain written procedures for the safe use of unsealed Lu-177 permitted by 10 CFR 35.300 that meet the requirements of 10 CFR 20.1101 (Radiation protection programs) and 10 CFR 20.1201 (Occupational Dose Limits for Adults)."
2. "Mountain View Hospital commits to develop, implement and maintain written waste disposal procedures for Lu-177 and detectable quantities of Lu-177m in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of 10 CFR Part 20, Subpart K, and of 10 CFR 35.92."
3. Confirm that the licensee has not undergone a change of control and that the licensee's legal entity name is "Mountain View Hospital".

For items #1 and #2, please note that the NRC medical licensing guidance (see attached NUREG-1556, Volume 9, revision 3, pages C-28 and C-29) provides medical licensees with the flexibility to "develop, implement and maintain written procedures" for the safe use of licensed material and for waste management. You have developed procedures that will need to be implemented and will need to be maintained by making revisions to these procedures internally as the program change. Not having these commitments in place will force you to submit a license amendment request every time that you make any kind of changes to these procedures.

Thank you for your cooperation.

Roberto J. Torres, M.S.
Senior Health Physicist
U.S. Nuclear Regulatory Commission, Region IV
1600 East Lamar Boulevard

Arlington, TX 76011-4511
817-200-1189

<p style="background-color: #d94941; border-style: solid; border-radius: 20px; border-color: #d94941; color: white; font-size: 1.5em; text-align: center;">This email originated from outside of the organization. Do not click or open attachments unless you recognize the sender and know the content is safe. If you have questions contact MVH/IFCH IT at 208-557-2705.</p>

Mr. Roberto Torres
USNRC/DNMS Region IV

Thank you for your assistance and review of the requested information.

Mountain View Hospital commits to develop, implement and maintain written procedures for the safe use of unsealed Lu-177 permitted by 10 CFR 35.300 that meet the requirements of 10 CFR 20.1101 (Radiation protection programs) and 10 CFR 20.1201 (Occupational Dose Limits for Adults).

Mountain View Hospital commits to develop, implement and maintain written waste disposal procedures for Lu-177 and detectable quantities of Lu-177m in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of 10 CFR Part 20, Subpart K, and of 10 CFR 35.92.

Mountain View Hospital has not undergone a change of control and the licensee's legal entity name is "Mountain View Hospital".

If you have any other questions, please do not hesitate to contact me.

David Theel, DABR
Radiation Safety Officer
Mountain View Hospital
Idaho Falls, Idaho



06/16/2021