

**Official Use Only - Security-Related Information**



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, ILLINOIS 60532-4352

**AUG 10 2021**

Iris Ouyang, M.S.  
Radiation Safety Officer  
Missouri Cancer Associates  
1705 E. Broadway  
Ste. 100  
Columbia, MO 65201

Dear Ms. Ouyang:

Enclosed is Amendment No. 30 to your NRC Material License No. 24-32604-01 in accordance with your request.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

If you have any questions concerning this amendment please contact me at either (630) 829-9841. My fax number is 630-515-1078. My email address is [colleen.casey@nrc.gov](mailto:colleen.casey@nrc.gov).

1. On Condition 12.C. of your license, we noted that Authorized Medical Physicists Gregory S. Dominiak and Abudulmehdy M. Jabir do not have terminal degrees listed after their names, such as "M.S." or "Ph.D."

In your next amendment request, please provide the terminal degrees that are appropriate for these individuals.

2. We noted that your letter dated May 21, 2021, included the statement "Please do not disclose my letter in public domain." No information that should be protected under 10 CFR 2.390 was identified to us in this letter.

We noted that your letter dated June 29, 2021, included the statement "Please keep this letter out of public domain for my privacy." No information of a personal or privacy nature that should be protected under 10 CFR 2.390 was identified to us in this letter.

Please provide only one complete, written response that is currently dated and signed by a senior management representative. If you have any specific questions concerning this letter or the information we are requesting, please contact me at either (630) 829-9841. My fax number is 630-515-1078. My email address is [colleen.casey@nrc.gov](mailto:colleen.casey@nrc.gov).

The enclosed document contains sensitive security-related information.  
When separated from this cover letter this letter is uncontrolled.

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Please do not resubmit any information beyond the scope of our specific requests, such as if you were to resubmit your original request in entirety again. Resubmitting in entirety, unless we request it, often delays the progress of our review without benefit to your licensed program.

Your written response should be addressed to my attention at the above address, as "additional information to control number 626964."

Please be sure to accompany/transmit your response with a brief business style letter that identifies your license by name, mailing address and license number; control number as given above; is currently dated; is physically and legibly signed by a senior management representative; is addressed to my attention; and completely resolves the information requested above to continue our review.

Please also be reminded that 10 CFR 30.9(a) requires:

" (a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

3. As discussed in a telephone call between you and me on August 5, 2021, going forward you must use Appendix F, "Checklist for Requests to Withhold Proprietary Information from Public Disclosure (Under 10 CFR 2.390)" in NUREG 1556 Vol. 9, Rev. 3. You cannot simply make an unfounded blanket statement to not disclose your letters.

The letter dated June 29, 2021, is being withheld as it has an attachment with security markings that merits protection from public disclosure.

In our telephone call on August 5, 2021, we also discussed your request in the letter dated June 29, 2021, to expand the authorization for Reed Cope, M.D. to include materials in 10 CFR 35.300. However, the information in 10 CFR 35.390(b)(1)(ii)(G) was not provided with Dr. Cope's specialty board certification. Please provide this information in a signed and currently dated preceptor attestation using NRC Form 313A (AUT) available on our Medical Licensing Toolkit website at:

<https://www.nrc.gov/materials/miau/med-use-toolkit.html#eval>.

4. In our telephone discussion on August 5, 2021, it became apparent that you needed the requests made in your letters dated May 21, 2021, and June 29, 2021, within an unspecified timeframe but sooner than the potential "90 days" we may normally need to conduct our review.

Neither of your letters contained specific requests or justification for expediting your review. For future reference, please note the following language to help guide your need for expedited amendment requests.

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“Expedite” Requests:

[For medical licensees only, please take special note of the definitions in 10 CFR 35.2; and the provisions in 10 CFR 35.13 and 35.14; 35.26; 35.24(c); 35.24(d); and, for Type A broad scope medical licenses, 10 CFR 35.49. If your request meets the requirements and/or criteria in these sections, it may be acceptable for you or your Radiation Safety Committee to internally evaluate and approve certain changes to your license and then use the notification processes described in these regulations, as appropriate.

For example, if a medical licensee wants to name an Authorized User (AU) physician to its license who is currently named to another NRC license for the exact same use, the licensee can allow that AU to begin work and utilize the notification process, as permitted by 10 CFR 35.13(b) and (c) and 35.14(a).]

We have noted that many licensees often add the word “expedite” or similar wording to their incoming correspondence, some almost routinely, thus creating an expectation that we will automatically interrupt work on cases already in queue to begin work on the cases requesting non-specific, unjustified and unsupported “expedites.”

This is disruptive to our process and often such cases contain no other information to justify and support the “expedite” request, nor a date when it is needed by. In addition, these cases are often of poor quality and require more time to review than should be expected.

Therefore, to assist us in serving you better, and in order to serve all of our applicants and licensees fairly, please contact us by telephone ((630) 829-9887, or a specific reviewer, if known) if an emergent medical situation or compelling business situation arises after you have submitted an amendment request to your license or new license application and if you can justify and support the need for that particular amendment/new license to be moved up in our normal reviewing queue.

Having this information enables our management to best decide how to handle your expedite request.

Please note that we normally process all licensing actions, including amendment requests, new license applications and renewals, in the order in which they are received, i.e., “first come, first served.” We have conducted business in this manner for more than 25 years, as of 2018.

As stated in our acknowledgment card, sent to all who submit licensing applications for our review, the initial review for amendments and new license applications is normally completed within 90 days of receipt, as an internal goal only.

The initial review for renewals is normally completed within 180 days of receipt, again as an internal goal only.

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The technical quality of your submission is a primary factor that only you can control in order to enable us to help you more promptly and minimize delays in the reviewing process.

Preparing your new license and amendment requests carefully and in accordance with NRC's regulatory requirements and guidance, especially the documents in the NUREG 1556 series, as well as other information on our website at <http://www.nrc.gov>, will help ensure that your correspondence is complete and accurate in all material respects, as 10 CFR 30.9 (a) requires it to be.

If you know of a truly emergent medical situation that is unforeseen and beyond the circumstances of your control or a compelling business situation impacting your license and you need a licensing action completed by a certain specific date (not "stat" or "as soon as possible," etc.), please advise us of the particulars of the situation, the specific date when the new license or amendment is needed and the specific justification and support for it, which should be briefly summarized.

Calling us directly is quickest, (630) 829-9500; depending on the situation, email may be useful.

Faxing your application/ request to us at 630-515-1078 is usually the most quick and reliable method of transmission. Only send one, complete, signed and dated application/ request. Do not submit more than one copy or other copies by different means of transmission, as doing so introduces errors in processing, delays and confusion.

During the current pandemic health emergency, it may be more expedient to contact a reviewer directly, if you are already working on something with one, and then email your request to that reviewer who would be expecting it.

In addition, please briefly explain why your new license or amendment was not completed and submitted to us at least 90 days prior to the date when you needed it by.

As the volume of non-specific "expedite" requests we receive is quite large, this information is important to determine whether a reasonable effort was, could or should have been made on your part to prepare and submit the request in a sufficiently timely manner to permit our review without passing over the licensing requests of others who made their submissions earlier.

NRC expects the first vetting of all incoming licensing requests to be performed by the requesting licensee/applicant to ensure that the application is complete and accurate in all material respects, which will enable us to more readily assess whether to "expedite" it and act upon it more quickly, with less interference and impact to the cases in queue ahead of it.

Please also ensure that an appropriate senior management official (required by 10 CFR 35.12(a)) and/or your Radiation Safety Officer signs and dates the new license

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application or amendment request letter. For expedite requests, it is preferable that a senior management official sign the request, as possible/appropriate.

Please include the name of at least one knowledgeable contact person who is familiar with your new license application or amendment request, his or her direct telephone number, and the best fax number to transmit the completed amendment to you. A business email address for the contact person may also be helpful in many circumstances.

Please address all licensing correspondence to: "ATTN: Materials Licensing Branch Chief" at the address shown below, unless you are directed to a specific, named reviewer for the immediate situation only.

NRC's Regulatory Issue Summary (RIS) 2005-31 provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through ADAMS, the NRC's electronic document system.

Pursuant to NRC's RIS 2005-31 and in accordance with 10 CFR 2.390, the enclosed license document is exempt from public disclosure because its disclosure to unauthorized individuals could present a security vulnerability.

The RIS may be located on the NRC Web site at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/ri200531.pdf> and the link for frequently asked questions regarding protection of security related sensitive information may be located at: <http://www.nrc.gov/reading-rm/sensitive-info/faq.html>.

A copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order

suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions.

Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

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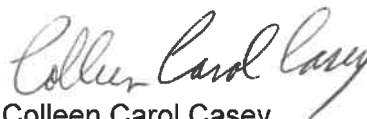
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The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture.

You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>.

We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Sincerely,



Colleen Carol Casey  
Materials Licensing Branch

Enclosure:

Amendment No. 30

License No. 24-32604-01  
Docket No. 030-37082