

August 19, 2021

Robin Elliott, Health Physicist Medical & Licensing Assistance Branch Division of Radiological Safety and Security U.S. NRC, Region I 2100 Renaissance Boulevard, Suite 100 King of Prussia, PA 19406-2713

Via Email to: Robin.Elliott@nrc.gov

Re: License No.: 55-25547-01

Docket No: 03035612 Control No: 627189

Dear Ms. Elliott:

As you have observed, the sealed sources were not inventoried at the required intervals during this prolonged storage period. Throughout the totality of the storage period, we have maintained continuous security but we did not inventory the sources at intervals not to exceed 180 days. The main reason was that with the door to the nuclear area decisively secured, we were under the impression that only security was necessary.

In January 2019, we received sealed sources from the now closed Cardiovascular Associates of the Virgin Islands, U. S. NRC license No. 55-31325-01. So, there were two inventories, one in November 2014 when the sources were leak tested and another in January 2019 when we received the sources from Cardiovascular Associates of the Virgin Islands.

Drs. Angelo and Dante Galiber along with physicist Dan Kane reviewed the inventory on August 12, 2021 during the NRC survey with you. All sources were present and accounted. We will formally inventory the sources again in February, 2022 and at intervals not to exceed 180 days.



A full inventory includes the following sources:

Sources possessed January 2019 to the present:

Description	<u>Isotope</u>	Activity	Serial No.	Reference	Manufacturer
				<u>Date</u>	
Vial Source	Co-57	5.727 mCi	1461-35-9	3/1/11	Eckert &
	-				Ziegler
Vial Source	Cs-137	197.7 uCi	1452-43-11	10/1/10	Eckert &
					Ziegler
Rod Source	Cs-137	500 nCi	1438-55-8	10/1/10	Eckert &
					Ziegler
Flood source	Co-57	5 mCi	1455-016	4/1/11	

Sources possessed November 2014 (and prior) to the present:

Description	<u>Isotope</u>	Activity	Serial No.	Reference	Manufacturer
				<u>Date</u>	
Rod	Cs-137	8.802 uCi	14034	11/01/2001	NAS
Vial Source	Cs-137	217 uCi	7155	04/01/2001	NAS
Rod Source	Cs-137	1.014 uCi	17442	04/02/2002	NAS
Vial Source	Co-57	10.58 MBq	96162	08/01/2006	NAS
Vial Source	Ba-133	9.195 MBq	5043	01/01/2001	NAS

We sincerely regret this oversight, have enjoyed an excellent inspection record in the past with both the NRC and ACR and this oversight will not re-occur.

Sincerely,

Andre Galiber, MD, RSO