



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

October 18, 2021

Dr. Constance Courtois, M.D.
Radiation Safety Officer
Barnes-Jewish St. Peter's Hospital
10 Hospital Dr.
Dept. of Radiology
St. Peters, MO 63376

SUBJECT: ADDITIONAL INFORMATION NEEDED REGARDING RENEWAL OF BARNES-JEWISH ST. PETER'S HOSPITAL, NRC LICENSE NO. 24-18968-01

Dear Dr. Courtois:

Our office has reviewed the June 21, 2021 application for NRC to renew Barnes-Jewish St. Peter's Hospital's (your) U.S. Nuclear Regulatory Commission (NRC) Materials License No. 24-18968-01. Upon review, our office has determined that additional information is needed to renew the license, regarding Facilities used for 10 CFR 35.200 medical use and leak tests conducted as part of the Radiation Safety Program. Your renewal application is available electronically from the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML21173A131. The NRC's ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. For additional guidance, please refer to [NUREG 1556 Volume 1, revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Medical Use Licenses,"](#) Sections 8.9.1, "Facility Diagram," pp. 8-45 to 8-50, and 8.10.11, "Leak Tests," pp. 8-81 to 8-82.

ITEM 9: FACILITIES AND EQUIPMENT – PET FACILITY INFORMATION:

1. The submitted facility diagram and information was unclear regarding whether PET radionuclides would be used under 10 CFR 35.200. **Please either confirm that no PET radionuclides will be used under 10 CFR 35.200, or provide shielding calculations, diagrams of use areas, and diagrams of surrounding areas, for facilities where PET radionuclides will be used, as described in the referenced guidance.**

ITEM 10: RADIATION SAFETY PROGRAM – LEAK TESTS:

2. The request omitted radiation safety program details requested in the most current version of NRC's guidance for medical use. Specifically, the request didn't confirm that written procedures would be maintained for any in-house leak-testing of sealed sources. **In accordance with NRC the referenced guidance, please confirm the following statements or provide supplemental information in accordance with NRC's guidance for medical use programs:**
 - *"We have developed and will implement and maintain written procedures for sealed-source leak testing that meet the requirements of 10 CFR 35.67."* **AND**

- For cases where a contractor may be used to perform leak testing, *“Leak test sample collection and analysis will be performed by an organization authorized by the NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits or sample analysis services to other licensees and according to the instructions provided in the leak test sample collection kit.”*

Please provide a response via a signed and dated letter within 10 days (on or prior to October 28, 2021). For quickest processing, please submit your response as a pdf file attached to an email message. You may also submit a response via fax or via regular mail. If you have any questions regarding this message, please do not hesitate to reach out to me at 630-829-9892.

In accordance with [Title 10 of the Code of Federal Regulations \(10 CFR\) Section 2.390](#) of the NRC’s “Rules of Practice and Procedure,” a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC’s ADAMS.

Sincerely,

Sara A. Forster, M.S.
Health Physicist
Materials Licensing Branch
Division of Nuclear Materials Safety

Docket No.: 030-17414
License No.: 24-18968-01
Control No.: 627053