

November 13, 2021

Casey Alldredge  
Health Physicist  
Materials Licensing and Decommissioning Branch  
Region IV, USNRC

**RE: Amendment Request for License #25-13173-02**  
**Mail Control Number: 628546**

Dear Casey Alldredge:

This letter is in response to your questions regarding the license amendment request referenced above with the Mail Control Number listed.

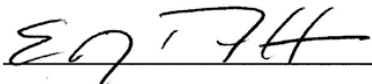
1. Box 3.C. of the NRC Form 313A (AUT) states that Dr Gallaher has personally participated in 3 cases involving “Parenteral administration of any radioactive drug that contains a radionuclide that is primarily used for its electron emission, beta radiation characteristics, alpha radiation characteristics, or photon energy of less than 150 keV, for which a written directive is required.” You provided the following dates for these procedures: 7/18/2013 8/13/2015, and 11/22/2016. Has Dr. Gallaher participated in any more recent cases?

No, he has not participated in any more recent cases.

2. Could you please confirm that Andrew Cupino, MD., Jerry Froelich, MD, and Jianling Yuan, MD are authorized for Parenteral administration of any radioactive drug that contains a radionuclide that is primarily used for its electron emission, beta radiation characteristics, alpha radiation characteristics, or photon energy of less than 150 keV, for which a written directive is required?

Yes, Andrew Cupino has 35.300 authorization on NRC License #25-12453-02. Jerry Froelich and Jianling Yuan have this authorization under a broad scope license at the University of Minnesota, which is an agreement state.

Thank you,



Jefferson Fairbanks, PhD  
Radiation Safety Officer, St. James Healthcare  
208-861-6501, [jfairbanks@radiationphysics.com](mailto:jfairbanks@radiationphysics.com)

**From:** [Jefferson Fairbanks](#)  
**To:** [Alldredge, Casey](#)  
**Subject:** [External\_Sender] Re: St James Healthcare NRC License Amendment Request for Information  
**Date:** Tuesday, November 16, 2021 8:03:08 AM  
**Attachments:** [Follow up Answers for 25-13173-02.pdf](#)

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Casey, please see the attached letter as you requested with the answers.

Jeff

On Friday, October 29, 2021, 04:20:32 PM MDT, Alldredge, Casey <[casey.allredge@nrc.gov](mailto:casey.allredge@nrc.gov)> wrote:

Good afternoon Dr. Fairbanks,

I am reviewing your license amendment request dated September 1, 2021, asking to add Dr. Ian Salzman Gallaher as an authorized user for 35.300 and I have a few questions.

1. Box 3.C. of the NRC Form 313A (AUT) states that Dr Gallaher has personally participated in 3 cases involving "Parenteral administration of any radioactive drug that contains a radionuclide that is primarily used for its electron emission, beta radiation characteristics, alpha radiation characteristics, or photon energy of less than 150 keV, for which a written directive is required." You provided the following dates for these procedures: 7/18/2013 8/13/2015, and 11/22/2016. Has Dr. Gallaher participated in any more recent cases?
2. Could you please confirm that Andrew Cupino, MD., Jerry Froelich, MD, and Jianling Yuan, MD are authorized for Parenteral administration of any radioactive drug that contains a radionuclide that is primarily used for its electron emission, beta radiation characteristics, alpha radiation characteristics, or photon energy of less than 150 keV, for which a written directive is required?

Please provide the answers to these in a signed and dated letter. It can be attached to an email or mailed in.

Thanks,

Casey Alldredge

Health Physicist

Materials Licensing and Decommissioning Branch

Region IV, USNRC