

Appendix

Consolidated Technical Analysis

The following table provides a list of 10 CFR Part 35 regulations and conditions the NRC has determined are applicable for use of Alpha DaRT. Licensees shall comply with all regulations which address use of Alpha DaRT. The table also provides specific conditions which the NRC has determined are necessary for the medical use of Alpha DaRT. In addition, the table lists where licensees and applicants can find additional guidance. Applicants may submit alternative list of regulations and specific conditions to be reviewed on a case-by-case basis by NRC staff.

Section	Description	Use Addressed in Regulation	Guidance	Alpha DaRT Guidance Section	Comment
35.1	Purpose and scope	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.2	Definitions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.5	Maintenance of records	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.6	Provisions for the protection of human research subjects	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.7	FDA, other Federal, and State requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.8	Information collection requirements: OMB approval	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		

Appendix

Consolidated Technical Analysis

35.10	Implementation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.11	License required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.12	Application for license, amendment, or renewal	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.13	License amendments	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.14	Notifications	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.15	Exemptions regarding Type A specific licenses of broad scope	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.18	License issuance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.19	Specific exemptions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
Subpart B – General Administrative Requirements					
35.24	Authority and responsibilities for the radiation protection program	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.26	Radiation protection program changes	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.9	The Alpha DaRT licensing guidance maybe revised as the industry gains more experience more about the technology.

Appendix

Consolidated Technical Analysis

					Licensees should be authorized to make radiation protection program changes to follow future revisions of the guidance. Licensees need to evaluate all aspects of its radiation safety program when adding a new use and make commensurate changes, i.e., area surveys, emergency procedures, radiation safety training, etc.
35.27	Supervision	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.40	Written directives (WDs)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	7.2	While a new requirement is not necessary, total source strength recorded on the written directive need to only include the Ra-224 activity.
35.41	Procedures for administrations requiring a WD	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.1	Requirements in 10 CFR 35.41 can be followed but additional commitments are needed. Due to the potential for leakage outside the patient's body, licensees need to commit to verify that seeds are fully contained without leakage outside the patient's body after administration. In addition, as seeds could be dislodged, licensees shall commit to evaluating the location of the seeds prior to removal for temporary implant brachytherapy to determine if the seeds moved during treatment to determine if a medical event occurred.
35.49	Suppliers for sealed sources or devices for medical use	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.50	Training for Radiation Safety Officer (RSO) and Associate RSO	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT	5.2.2	While a new condition is not necessary, the guidance reminds licensees of the requirement in 10 CFR 35.50(d) which

Appendix

Consolidated Technical Analysis

			<input type="checkbox"/> Other		requires RSOs to have training in the radiation safety, regulatory issues, and emergency procedures for the types of use for which a licensee seeks approval
35.51	Training for an authorized medical physicist (AMP)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		Use of Alpha DaRT does not require AMP.
35.55	Training for an authorized nuclear pharmacist (ANP)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		Use of AlphaDaRT does not require ANP.
35.57	Training for experienced RSO, teletherapy or medical physicist, AMP, authorized user, nuclear pharmacist, and ANP	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.59	Recentness of training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
Subpart C – General Technical Requirements					
35.60	Possession, use, and calibration of instruments used to measure the activity of unsealed byproduct material	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		As licensees are not required to determine dosages in accordance with 10 CFR 35.63, no additional condition is necessary here. Calibration is described further in the table under 10 CFR 35.432.
35.61	Calibration of survey instruments	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.63	Determination of dosages of unsealed byproduct material for medical use	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.7	As Alpha DaRT is a brachytherapy device, licensees do not need to comply with 10 CFR 35.63.
35.65	Authorization for calibration, transmission, and reference sources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		

Appendix

Consolidated Technical Analysis

35.67	Requirements for possession of sealed sources and brachytherapy sources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.69	Labeling of vials and syringes	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.4	Alpha DaRT is not a radioactive drug and does not require labeling per 10 CFR 35.69 is not required. Licensees shall commit to label applicators in accordance with the sealed source and device registry.
35.70	Surveys of ambient radiation exposure rate	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.5	As Alpha DaRT has a higher potential for contamination, licensees shall commit to performing surveys after every administration, not just once per day. Both ambient radiation and contamination surveys should be performed.
35.75	Release of individuals containing unsealed byproduct material or implants containing byproduct material	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	7.3	While there are no additional commitments, the guidance gives additional radiation safety items licensees should consider to ensure patient release limits are not exceeded. See Regulatory Guide 8.39 , "Release of Patients Administered Radioactive Materials." for more guidance.
35.80	Provision of mobile medical service	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
	Decay-in-storage	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input checked="" type="checkbox"/> Other		
Subpart F – Manual Brachytherapy					
35.400	Use of sources for manual brachytherapy	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	7.4	While there are no additional commitments, additional guidance is given to use the applicators as listed in the Sealed Source and Device registry as the applicators are specific to radiation safety.

Appendix

Consolidated Technical Analysis

35.404	Surveys after source implant and removal	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.406	Brachytherapy sources accountability	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	7.5	While there is no additional commitments, additional guidance is given on how licensees can maintain accountability and document the location of use.
35.410	Safety instruction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.415	Safety precautions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.8	In addition to the commitments in 10 CFR 35.415, use of sealed container is necessary for all waste and unsealed sources to control contamination.
35.432	Calibration measurements of brachytherapy sources	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.7	As permitted by 10 CFR 35.432, it is expected that licensees will use measurements provided by the source manufacturer instead of making their own calibration measurements. However, as there is a potential that the applicator could leak, licensees shall commit to ensure the integrity of the applicator seal prior to administering seeds to a patient in addition to following 10 CFR 35.432.
35.433	Sr-90 sources for ophthalmic treatments	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.457	Therapy-related computer systems	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.490	Training for use of manual brachytherapy sources	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	5.2	Similar to 10 CFR 35.490 but specific for Alpha DaRT.

Appendix
Consolidated Technical Analysis

35.491	Training for ophthalmic use of Sr-90	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
Subpart L – Records					
35.2024	Records of authority and responsibilities for radiation protection programs	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.2026	Records of radiation protection program changes	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input checked="" type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.9	Records of radiation protection program changes made per the commitment which replaced 10 CFR 35.26 must be kept for 5 years similar to the requirements in 10 CFR 35.2026.
35.2040	Records of WDs	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.2041	Records for procedure for administrations requiring a WD	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.1	As a commitment for additional procedures for administration is necessary, licensees must commit to maintain a record of these procedures for the duration of the license similar to the requirement in 10 CFR 35.2041.
35.2060	Records of calibrations of instruments used to measure the activity of unsealed byproduct materials	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.2061	Records of radiation survey instrument calibrations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.2063	Records of dosages of unsealed byproduct material for medical use	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		As 10 CFR 35.63 is not required, these records are not applicable for Alpha DaRT.

Appendix
Consolidated Technical Analysis

35.2067	Records of leaks tests and inventory of sealed sources and brachytherapy sources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.2070	Records of surveys for ambient radiation exposure rate	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.5	In addition to 10 CFR 35.2070, licensees should also keep a record in a similar manner as 10 CFR 35.2070 of surveys after each administration.
35.2075	Records of the release of individuals containing unsealed byproduct material or implants containing byproduct material	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	7.3	See Regulatory Guide 8.39 , "Release of Patients Administered Radioactive Materials." for more guidance.
35.2080	Records of mobile medical services	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.2092	Records of decay-in-storage	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.2204	Records of Mo-99, Sr-82, and Sr-85 concentrations	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.2404	Records of surveys after source implant and removal	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.2406	Records of brachytherapy source accountability	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	7.5	While there is no additional commitments, additional guidance is given on how licensees can maintain accountability and document the location of use.

Appendix

Consolidated Technical Analysis

35.2432	Records of calibration measurements of brachytherapy sources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.7	
35.2433	Records of decay of Sr-90 sources for ophthalmic treatments	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
Subpart M – Reports					
35.3045	Report and notification of a medical event	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other	6.2	As Alpha DaRT seeds are unsealed brachytherapy sources, not all medical event criteria listed in 10 CFR 35.3045 is applicable. Therefore, use of Alpha DaRT needs unique medical event reporting criteria such as that described in the Alpha DaRT guidance.
35.3047	Report and notification of a dose to an embryo/fetus or a nursing child	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.3067	Report of a leaking source	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input checked="" type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.3204	Report and notification for an eluate exceeding permissible Mo-99, Sr-82, and Sr-85 concentrations	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
Subpart N – Enforcement					
35.4001	Violations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		
35.4002	Criminal penalties	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1566 Vol 9 <input type="checkbox"/> Alpha DaRT <input type="checkbox"/> Other		

Appendix
Consolidated Technical Analysis

Additional Considerations		