

**Delaware Imaging Network
12 Omega Drive, Building L
Newark, DE 19713**

April 28, 2022

Jonathan B. Pfingsten
Senior Health Physicist
U.S. Nuclear Regulatory Commission, Region I
Medical and Licensing Assistance Branch
Division of Radiological Safety and Security
2100 Renaissance Blvd.
King of Prussia, PA 19406-2713

RE: **Delaware Imaging Network
License Number: 07-16529-01
Mail Control Number: 630251**

Response Letter in Support of Our Pending Renewal Application

Dear Mr. Pfingsten:

Pursuant to your letter dated April 26, 2022, the following responses are provided in support of our pending renewal application. Each response will numerically correspond to the questions addressed in your letter.

1.
 - a. We confirm that possession and utilization requested under 35.100 and 35.200 will be for any chemical and/or physical form.
 - b. We confirm that the "Purpose of Use" for materials permitted under 35.100 will be for "Any uptake, dilution, and excretion studies/procedures".
 - c. We confirm that the "Purpose of Use" for materials permitted under 35.200 will be for "Any imaging and localization studies/procedures".
 - d. We confirm, that we are not requesting, the possession and/or use of calibration sources that do not meet compliance with regulations addressed under 35.65.
2. We confirm that PET procedures will not be conducted under our RAM license.

3. In regards to the RSO's roles and responsibilities, we will adopt the model procedure outlined within NUREG-1556, Volume #9, Revision 3, Appendix I entitled: "Radiation Safety Officer Duties, Responsibilities, and Delegation".
4. We have developed and will implement and maintain written procedures for a program for training required under 10 CFR 19.12 for each group of workers, including (i) topics covered, (ii) qualifications of the instructors, (iii) method of training, (iv) method for assessing the success of training, (v) initial training, and (vi) annual refresher training.
5. Radiation monitoring instruments will be calibrated by a vendor who is licensed by the NRC or an Agreement State to perform instrument calibrations.
6. No response required.
7. Equipment used to measure dosages will be calibrated in accordance with nationally recognized standards or the manufacturer' instructions.
8. We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits stipulated in 10 CFR 20.1502.
9. We will develop, implement, and maintain written procedures for licensed material accountability and control to ensure that: license possession limits are not exceeded; licensed material in storage is secured from unauthorized access or removal; licensed material not in storage is maintained under constant surveillance and control and records of receipt (either from the licensee's own production operations or from another licensee), transfer, disposal of licensed material, are maintained.
10. No response required.
11. We have developed and will implement and maintain written procedures for sealed source leak testing that meets the requirements of 10 CFR 35.67.
12. We have developed and will implement and maintain written procedures for area surveys in accordance with 10 CFR 20.1101 that meet the requirements of 10 CFR 20.1501 and 10 CFR 35.70.
13. We have developed and will implement and maintain written procedures for safe use of unsealed byproduct material that meet the requirements of 10 CFR 20.1101 and 10 CFR 20.1201.

14. We confirm that we have developed and will implement and maintain written waste disposal procedures for licensed material in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of 10 CFR Part 20, Subpart K, and of 10 CFR 35.92.

If you require additional information, please contact Michael W. Lairmore, M.S., our medical physics consultant at wmlairmore@gmail.com or (201) 693-2277.

We thank you for your assistance with this pending licensing action.

Sincerely,

A handwritten signature in cursive script that reads "Jamie Wills".

Jamie Wills, Director of Operations
Delaware Imaging Network