

From: [Seeley, Shawn](#)
To: [Adriana Cordova](#)
Cc: [Nguyen, Jan](#); [DeFrancisco, Anne](#)
Subject: NRC License amendment to Storage only status
Date: Wednesday, August 10, 2022 8:49:00 AM

Adriana,

I promised you some information regarding your license and an option for your current situation. It appears you are in a holding pattern until you can find add 35.400 and/or get patients for the 35.300 treatments. Therefore, it makes sense to move into a "Possession only-Standby License" until such time as you can get back up and running. The annual fee for this is currently \$9,900.00. However, you stated during the last inspection that you qualified as a small entity. I would continue with that request. You may need to submit another small entity request when getting this annual fee.

In order to make this change, please submit an amendment request with the following information:

1. Please request to move to a "possession only – standby" program code.
2. Please identify all licensed material to be placed in storage. For each sealed source or device containing a sealed source, identify (if possible) the source and device by manufacturer, model number, serial number, isotope, activity, date of assay, and date of last leak test.
3. Please include a clear commitment not to use the licensed material for any purpose, pending disposal or authorization to restart (as applicable).
4. Please include a physical description of the facilities where the material will be stored if it is different from storage facilities already approved in the license. Any planned facility changes have been identified, and provisions to maintain exposures as low as reasonably achievable are adequate.
5. Please identify the individual who will be responsible for maintaining control of the licensed material while it is in storage. The individual's training and experience, as described in the individual's resume, are adequate. The necessary qualifications will vary depending on the material being stored. In general, the responsible individual should have a working knowledge of basic radiation safety practices and the regulatory requirements associated with the material being stored.
6. Please include an acceptable accountability program for assuring that the licensed material remains in secure storage and is not used (inventoried at least annually). The program provides reasonable assurance that the licensee will maintain security.
7. Please include all planned changes to limit/decrease the licensee's radiation safety program, as a result of placing the licensed material in storage. These changes may include, but are not limited to, the following:
 - a. Dosimetry services
 - b. Worker training programs
 - c. Instrument calibration services
 - d. Inventories
 - e. Internal audits
 - f. Maintenance and visual inspection of equipment and facilities
 - g. Maintenance of records
8. Please include, if applicable, a commitment to leak test sealed sources and devices containing

sealed sources at least once every 10 years and within 6 months before use or transfer to an authorized recipient.

I am on a rotation until November 19, 2022. I have copied Ms. Jan Nguyen on this email as she will be the one who can help you if you have additional questions. I will still answer your questions if you contact me, but wanted you to realize there may be a delay in getting back to you.

Hope all else is well.

Let us know if you have any questions.

Shawn W. Seeley

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