

**Francis Palermo, M.D.
620 Christiana-Stanton Road, Suite 301
Metroform Medical Complex
Newark, DE 19713
(302) 994-1100**

August 31, 2022

Patrick-John E. Hann
Health Physicist
Nuclear Regulatory Commission
Medical and Licensing Assistance Branch
Division of Radiological Safety and Security, Region 1
475 Allendale Road, Suite 102
King of Prussia, PA 19406-1415

RE: Response Letter in Support of Pending Renewal Application
Francis Palermo, M.D.
License Number: 07-28780-01
Control Number: 631509

Dear Mr. Hann:

Pursuant to your correspondence dated August 22, 2022, the following responses are provided in support of our pending renewal application. Each response will numerically correspond to the questions outlined in your submission.

1. We confirm the following address is the "Location of Use" where radioactive materials are possessed, used and stored:

**620 Christiana-Stanton Road, Suite 301
Metroform Medical Complex
Newark, DE 19713**

2. In regards to Items 5 and 6, we confirm the following:
 - a. We confirm we are requesting authorization for all materials and procedures outlined in 10 CFR 35.200
 - b. We confirm we are requesting the Chemical and/or Physical Form as "**Any Form**".

- c. We confirm the “Maximum Amount” to be approved “As Needed”.
- d. We confirm the Purpose of Use as; “Medical Use & Instrument Calibrations” for Any Imaging and Localization Studies permitted by 10 CFR 35.200.
- e. We confirm we are not seeking possession and/or use of additional sources not authorized under 35.65, 35.100 and 35.200.

I have also provided the original Item 5 and 6 included in the renewal application submitted in May 2022. Please refer to the following for details.

<u>BYPRODUCT MATERIAL</u>	<u>AMOUNT</u>	<u>PURPOSE</u>
Any radioactive material permitted by 35.200 (except generators and gases)	As Needed	Medical Use

We confirm that possession and utilization requested under 35.200 will be for any chemical and/or physical form.

In addition, we confirm that the “Purpose of Use” for material permitted under 35.100 will be for “Any uptake, dilution and excretion studies/procedures”. Additionally, we confirm that the “Purpose of Use” for materials permitted under 35.200 will be for “Any imaging and localization studies/procedures”.

We confirm, we are not requesting the possession and/or use of calibration sources that do not meet compliance with regulations stipulated under 35.65.

- 3. We confirm that this licensee will not be using PET materials.
- 4. We confirm that Francis A. Palermo, M.D., will remain as the Radiation Safety Officer. Dr. Palermo may be reached at the following: cardpal2@comcast.net or (302) 373-2324.
- 5. No response submitted.
- 6.
 - a. 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 in 10 CFR 20.1502.
- 7. We will develop, implement, and maintain written procedures for licensed material accountability and control to ensure:
 - a. License possession limits are not exceeded.
 - b. Licensed material in storage is secured from unauthorized access or removal.

- c. Licensed material not in storage is maintained under constant surveillance and control.
 - d. Records of receipt (either from the licensee's own production operations or from another licensee), transfer, and disposal of licensed material, are maintained.
- 8.
- a. 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.
 - b. We request our commitment regarding action trigger limits be rescinded from our renewal application.
9. No response submitted.

If you require additional information, please contact Michael W. Lairmore, M.S. our Medical Physics Consultant at: (201) 693-2277 or wmlairmore@gmail.com.

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

Sincerely,



Francis Palermo, M.D.
Radiation Safety Officer
President