



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD – SUITE 102  
KING OF PRUSSIA, PA 19406-1415

January 18, 2023

Doug Bentz, Chief Executive Officer  
Roane General Hospital  
200 Hospital Drive  
Spencer, WV 25276-1060

**SUBJECT: ROANE GENERAL HOSPITAL, REQUEST FOR ADDITIONAL INFORMATION,  
MAIL CONTROL NO. 633349**

Dear Mr. Bentz:

This is in reference to your application dated October 10, 2022, requesting to renew NRC License No. 47-17046-01. In order to continue our review, we need the following additional information:

1. Items 5 and 6, Radioactive Material and Use, and Item 9, Facility Diagram and Other Equipment and Facilities – Your application did not directly discuss the use of PET materials. Therefore, please confirm that you do not possess nor intend to use PET materials under this license.
2. Item 6, Purpose(s) for Which Licensed Material will be Used - Your renewal request listed the purpose for which licensed material will be used as “Medical Use”. However, this statement is not a sufficient description detailing each purpose of use. Please confirm the purpose of use for 35.100 as “any uptake, dilution, and excretion study permitted by 10 CFR 35.100” and for 35.200 as “any imaging and localization study permitted by 10 CFR 35.200.”
3. Item 7, Radiation Safety Officer (RSO) - Your application seeks to retain Mr. Mark T. Perna as the RSO for this license. It appears that Mr. Perna is a contractor/consultant. Given that Mr. Perna is a consultant, we will need the following information:
  - a. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of onsite time (hours per week or days per quarter, as appropriate for the program).
  - b. Identify an in-house representative who will serve as the point of contact during the RSO's absence.
  - c. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of the radiation safety program and related regulatory requirements.
  - d. Specify the maximum amount of time it will take the consultant-RSO to arrive at

the facility in the event of an emergency that requires his/her presence.

4. Item 9, Facility Diagram – Your application contained a facility diagram that did not explicitly include all necessary information. Please provide the following information:
  - a. Indicate a scale for the facility diagram, and ensure the drawing is to scale.
  - b. Label all room numbers, if they exist (e.g., scanner room, hot lab, etc.).
  - c. The NRC Form 591M Part 1, “Safety Inspection Report and Compliance Inspection,” regarding the NRC inspection of your license on October 17, 2022 through November 15, 2022 documented a violation of 10 CFR 20.1801, “Security of Stored Material.” To achieve compliance, you relocated licensed materials to a new, secure storage location as confirmed on October 31, 2022. The information contained within this form was acknowledged by Ms. Holly Fields, Radiology Manager, on December 12, 2022. However, the diagram submitted with your renewal does not reflect any relocation of byproduct materials or updated storage location. Therefore, please indicate the areas where byproduct material is stored and describe how the storage location is secured.
  - d. Please indicate if there are any additional areas where radioactive materials are used or stored (e.g., stress lab, waste storage area). If so, please provide an updated facility diagram including these additional areas. If possible, please provide a diagram which shows where these areas are located relative to the hot lab/imaging suite.
  - e. Please note: Drawings and diagrams that provide the exact location of materials or depict specific locations of safety or security equipment should be marked as “Security-Related Information – Withhold Under 10 CFR 2.390.”
5. Item 9, Radiation Monitoring Instruments – In your renewal letter, you state that your facility has both a “Biodex 14-C” survey meter and a “Ludlum 14-C” survey meter. To confirm that these instruments are adequate to measure the type and level of radioactive material used, please provide both the make and model numbers of the probe attachments used, respective to each survey meter.
6. Item 9, Radiation Monitoring Instruments – Please confirm that you “reserve the right to upgrade your survey instruments, as necessary, as long as they are adequate to measure the type and level of radiation for which they are used.”

We will continue our review upon receipt of this information. Please reply to my attention at [Valerie.Gray@nrc.gov](mailto:Valerie.Gray@nrc.gov), referencing mail control number 633349.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC’s regulations is available on the NRC Web Site at: [www.nrc.gov](http://www.nrc.gov). Additional information regarding medical uses of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/med-use-toolkit.html>. This

site also provides the updated Training and Experience NRC Form 313A series of forms and guidance, as well as information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at 610-337-5193 or via electronic mail at [Valerie.Gray@nrc.gov](mailto:Valerie.Gray@nrc.gov).

Thank you for your cooperation.

Sincerely,

**Valerie A.  
Stowell**

Digitally signed by  
Valerie A. Stowell  
Date: 2023.01.18  
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Valerie Stowell, Health Physicist  
Medical and Licensing Assistance Branch  
Division of Radiological Safety and Security  
Region I

License No. 47-17046-01  
Docket No. 03012105  
Mail Control No. 633349

cc: Mark T. Perna, Radiation Safety Officer  
Holly Fields, Radiology Manager  
Jan Nguyen, Senior Health Physicist

ROANE GENERAL HOSPITAL, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 633349 DATED JANUARY 18, 2023

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SUNSI Review Complete: V. Stowell

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OFFICE	RI:DRSS	N					
NAME	V. Stowell (VS)						
DATE	1/18/2023						

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