



### CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU		DATE OF CONTACT	TYPE OF CONVERSATION	
David Husted		11/14/2022	<input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING	
E-MAIL ADDRESS		TELEPHONE NUMBER		
david.husted@siemens-healthineers.com		(484) 502-6387		
ORGANIZATION		DOCKET NUMBER(S)		
PETNET Solutions, Inc.		030-38347		
LICENSE NAME AND NUMBER(S)		MAIL CONTROL NUMBER(S)		
PETNET Solutions, Inc. License No. 41-32720-06		CN 631947		
SUBJECT				
Pending NRC License Renewal Request - Additional Information Required				
SUMMARY AND ACTION REQUIRED (IF ANY)				
Please provide your response to the following items by no later than Friday, December 9, 2022.				
<p>1. Unsealed and Sealed Byproduct Material</p> <p>a.) Provide the manufacturer, model number, radionuclide, and quantity for calibration and reference sources to be authorized on the license.</p> <p>b.) On page 3 you request 250 mCi total of any byproduct material with atomic numbers 3-83, while on pages 6 and 8 you request a total of 100 mCi to account for both fixed and removable material. Please clarify the requested possession limit.</p> <p>2. Financial Assurance and Recordkeeping for Decommissioning</p> <p>a.) In the application dated July 25, 2022 you indicate that the Decommissioning Cost Estimate will be submitted separately. Please note that 10 CFR 30.35 requires that decommissioning funding plans be completed and provided in any application license renewal. Please submit evidence of financial assurance following the guidance described in NUREG 1757 Vol. 3.</p> <p>b.) State the following: "Pursuant to 10 CFR 30.35(g), we will maintain records important to decommissioning and transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned, in accordance with 10 CFR 30.34(b). Furthermore, pursuant to 10 CFR 30.51(f), prior to license termination, we will forward the records required by 10 CFR 30.35(g) to the appropriate NRC regional office or assign the records to the appropriate NRC regional office before the license is terminated."</p>				
NAME OF PERSON DOCUMENTING CONVERSATION				
Laura B. Cender				
SIGNATURE			DATE OF SIGNATURE	
			11/14/2022	

**CONVERSATION RECORD (continued)**

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**SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)**

3. Training for Individuals Working In or Frequenting Restricted Areas  
Please provide a statement confirming that ancillary staff do not access restricted areas.

4.) Facilities and Equipment

- a.) Describe your program for evaluating the integrity of the delivery lines that supply F-18 to the hot cells and mini-cells from the cyclotron. Describe safety procedures for conducting a change out of old delivery lines with new.
- b.) Submit a copy of the most recent annual survey of areas adjacent to, above, and below the cyclotron, hot cells, and mini cells when production is at its peak to demonstrate that expected radiation levels that workers will be exposed to. Include the instrument used and the date of the last calibration.
- c.) Confirm that ventilation systems associated with the cyclotron are independent of other ventilation systems in the building. Describe the location of the nearest intake for the building's main ventilation system in relation to the exhaust point for effluent from the cyclotron/pharmacy operation.
- d.) Provide recent air sampling data to demonstrate that air effluent released is within the requirements described in 10 CFR Part 20 including 20.1101(d) and 20.1301.

5.) Occupational Dose

- a.) Provide the following statement: "We have developed and will implement and maintain written procedures for monitoring occupational doses that meet the requirements in 10 CFR 20.1501, 10 CFR 20.1502, 10 CFR 20.1201, 10 CFR 20.1202, 10 CFR 20.1203, 10 CFR 20.1204, 10 CFR 20.1207, 10 CFR 20.1208, and 10 CFR 20.2106, as applicable."
- b.) "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(a)."
- c.) Please provide the alarming dosimeter set points used for cyclotron maintenance and emergencies.

6.) Radiation Monitoring Instruments  
Please state the following: "We will use instruments that meet the radiation-monitoring instrument specifications published in Appendix F of NUREG-1556, Vol. 21, 'Program-Specific Guidance About Possession License for Production of Radioactive Materials Using an Accelerator.'"

7.) Safe Operating and Emergency Procedures  
Please state the following: "Procedures will be revised only if (i) the changes are reviewed and approved by the licensee management and the RSO in writing; (ii) the licensee staff is provided training in the revised procedures before implementation; (iii) the changes are in compliance with NRC regulations and the license; and (iv) the changes do not degrade the effectiveness of the program."

8.) Surveys and Leak Tests

- a.) Confirm that a survey meter will be used during leak testing to monitor exposure.
- b.) Confirm that notification will be provided to the NRC in the even that a leaking source is identified.