



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

August 22, 2023

Bryce A. Caudle, M.S., CHP, DABSNM
Radiation Safety Officer
Woodlawn Hospital
1400 E. 9th St.
Rochester, IN 46975-0837

Dear Mr. Caudle:

This letter is regarding the request dated April 19, 2023, signed by Alan Fisher, Chief Executive Officer, for the renewal of U.S. Nuclear Regulatory Commission (NRC) Materials License No. 13-20338-01.

The U.S. NRC's guidance document for your type of license, which I refer to below as "the guidance," is NUREG-1556, Volume 9, Rev. 3, dated September 2019, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Medical Use Licenses." This guidance is available on the U.S. NRC website at:
<https://www.nrc.gov/docs/ML1925/ML19256C219.pdf>

Upon review of the request, I identified the following areas requiring additional or clarifying information:

1. Section 8.7.1, "Radiation Safety Officer," of the guidance, identifies that if the Radiation Safety Officer (RSO) is an outside consultant or contractor, the following items should be addressed in the license application:
 - 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 size of the program);
 - Identify an in-house representative who will serve as the point of contact during the RSO's absence;
 - 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; and
 - 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 or her presence.

Please provide information and commitments addressing each of the above items.

2. Section 8.9.2., "Radiation Monitoring Instruments," of the guidance, identifies that your application must describe the radiation detection instruments available for measuring radiation levels, radioactive contamination, and radioactivity, as applicable.

Your application identified that you currently possess the following radiation detection instruments:

- Capintec CRC 15R Dose Calibrator;
- Biodex AtomLab 500 Well Scintillation Counter; and
- Ludlum 14C Survey Meters

Your Ludlum Model 14C Survey Meters should be equipped with an external probe for measuring the typical radiation levels in your facility and for detecting and assessing radioactivity and radioactive contamination at your facility.

Please identify the compatible external probes used with your Ludlum Model 14C Survey Meters.

In accordance with [10 CFR §2.390](#) of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

To continue review of the request, please submit your response to this letter within 30 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. I will assume that you do not wish to further pursue this licensing action if I do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, I encourage you to contact me at (630) 829-9737 or via e-mail at Jason.Kelly@nrc.gov.

Sincerely,

Jason M. Kelly, MPH
Health Physicist
Materials Licensing Branch

Docket No.: 030-18270
License No.: 13-20338-01
Control No.: 635503