



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

November 1, 2023

David Herring, DVM, DACVR  
Radiocat, LLC  
32A Mellor Avenue  
Baltimore, MD 21228

SUBJECT: RADIOCAT, LLC, REQUEST FOR ADDITIONAL INFORMATION, MAIL  
CONTROL NO. 637521

Dear Dr. Herring:

This is in reference to your letter dated September 6, 2023, requesting to amend NRC License No. 45-25330-01. In order to continue our review, we need the following additional information. Please be aware that all "Item", "Section", and "Appendix" references below are referring to NUREG 1556, Volume 7, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope, Including Electron Capture Devices and X-Ray Fluorescence Analyzers" found at <https://www.nrc.gov/docs/ML1806/ML18065A006.pdf>.

1. Item 13, Certification - The NRC views a letter signed by a management representative as indication that management has reviewed the application and concurs in the statements and representations contained therein. Our records have Dr. Rand Wachsstock listed as the licensee's senior management contact. The September 6, 2023, letter was signed by yourself, Dr. Herring.
  - a. Please confirm that Dr. Herring is authorized to make legally binding commitments on behalf of the licensee organization.

OR

- b. If Dr. Herring is not authorized to make legally binding commitments on behalf of the licensee organization, please have an individual authorized to make legally binding commitments on behalf of the licensee organization provide either of the following:
  - i. Confirm that you endorse the requests and statements submitted by Dr. Herring on behalf of your organization in the renewal request dated September 6, 2023.

OR

- ii. State that you do not endorse the requests and statements submitted by Dr. Herring on behalf of your organization in the renewal request dated September 6, 2023, and request to withdraw the requests and statements.

2. Item 3, List Address And/Or Temporary Job Site (TJS) Address, Where Licensed Materials Will Be Used Or Possessed – Your September 6, 2023, letter stated that the Newark, DE site is being decommissioned. When these decommissioning activities are completed, please submit a separate request to remove this location from your license. No further information is required for this item at this time.
3. Item 7, Radiation Safety Officer – Your September 6, 2023, letter stated that documentation of Kathleen Olsen’s completion of a RSO course was in attachment 1.a. However, your letter did not include an attachment 1.a or any other specific documentation of the referenced course’s completion. Please submit this documentation.
4. Item 7, Radiation Safety Officer – Your September 6, 2023, letter included a description of Dr. Olsen’s experience performing the RSO duties, including an individual certifying the performing of these duties, in attachment 1.b. However, this attachment does not actually state who is providing the attestation, nor is there any signature for this individual. Please resubmit this attachment with the individual’s name and signature for reference.
5. Item 7, Radiation Safety Officer – The NRC’s expectation is that the RSO is routinely onsite to review the program, including observations and audits of licensed activities. Please provide an estimate of the time in a given calendar quarter or year that the proposed RSO will be onsite at your licensed facilities.
6. Item 7, Radiation Safety Officer – Your delegation of authority letter specifically stated “In addition, you are free to raise issues with the Virginia Department of Health at anytime.” Please confirm that this extends to raising issues with the US Nuclear Regulatory Commission.

We will continue our review upon receipt of this information. Please reply to my attention at [Jonathan.Pfingsten@nrc.gov](mailto:Jonathan.Pfingsten@nrc.gov).

In order to continue prompt review of your application, we request that you submit your response to this letter within 15 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 use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated 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 “Agency Rules of Practice and Procedure,” 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 610-337-5170 or via electronic mail at [Jonathan.Pfingsten@nrc.gov](mailto:Jonathan.Pfingsten@nrc.gov).

Thank you for your cooperation.

Sincerely,

Jonathan Pfingsten, Senior Health Physicist  
Medical and Licensing Assistance Branch  
Division of Radiological Safety and Security  
Region I

License No. 45-25330-01  
Docket No. 030-33825  
Mail Control No. 637521

RADIOCAT, LLC, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 637521 DATED NOVEMBER 1, 2023

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SUNSI Review Complete: Jonathan Pfingsten

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