



U.S. Nuclear Regulatory Commission, Region 1
Division of Nuclear Materials Safety
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

RE: NRC License# 06-00649-03, Response to Request for Additional Information

Date: 10/10/2023

The following items are in response to the letter dated October 3, 2023:

1. Please see attached additional information pertaining to PET and HDR units.
2. Other than our HDR source, our organization does not possess sealed sources that are not addressed by 10 CFR 35.65.
3. Our organization will not perform source installations or maintenance on the HDR unit.
4. The workload and occupancy factors in both the PET radiation survey from 2016 and the HDR survey from 2017 remain consistent with current operations.
5. We do not possess a Sr-82/Rb-82 generator.

If you have any questions or need further information, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Justin Drew', with a long, sweeping horizontal stroke extending to the right.

Justin Drew
Vice President, Ambulatory and Clinical Services

Regarding additional safety measures and equipment utilized to reduce workers exposures to PET radionuclides (item 1a):

- Patient doses are transported via a shielded cart.
- Syringe shields, specifically designed for PET radionuclides, are utilized.
- Tongs are available to reduce exposure when handling PET radionuclides.
- There is an L-Block in the Hot Lab that is utilized for drawing and measuring doses.
- There is a dedicated PET injection room with video monitor.
- Waste is stored in a shielded container appropriate for PET radionuclides.

Regarding our HDR unit and questions in item 1 b:

i. Warning systems and restricted area controls (e.g., locks, signs, warning lights & alarms, interlock systems);

- The treatment door has an interlock to prevent treatment with the HDR unit if the door is open.
- Since this is a dual use vault (HDR and Linac), there is a switch in the treatment console area that limits the equipment such that only one piece of equipment can be operated at a time.
- Postings at the entry to the treatment vault include "Caution Radiation Area" and "Caution Radioactive Materials".
- A sign above the treatment door illuminates, "HDR in Use", when the unit is in use.
- The HDR Afterloader is stored in the treatment vault in a locked cabinet. The keys are kept in a separate location protected by a tumbler lock system. Physics controls access to the keys.
- Emergency procedures, including contact information, are posted at the console.

ii. Area radiation monitoring equipment;

- The treatment vault (adjacent to the treatment area - visible by the patient and by staff via the video system) and the console area (directly above the treatment console) are equipped with a Prime Alert. The Prime Alert is equipped with a battery backup pack to ensure proper functioning in the event of a power outage.

iii. Viewing and intercom systems; and

- The treatment console is equipped with a video monitoring system and a two-way intercom system.

iv. Emergency response equipment.

- Survey Meters: Raysafe 452 and Fluke 451: At the console
- Mobile Lead "Pig" with Tongs: Inside the treatment vault next to the treatment unit
- Flashlight: At the console
- Stop Watch: At the console