



Region I Office
Division of Radiological Safety and Security
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Telephone Conversation Record

Date: November 16, 2023

License No. 52-24937-01

Docket No.(no hyphens): 03030140

Mail Control/Report No. 635844

Licensee Name: Rio Piedras Sono-Nuclear Center

Participant(s) Name/Title: David C. Brandon, M.D., Residency Program Director of Emory University

Work Telephone No. (404) 778-2626

Business Cellphone No. N/A

NRC Representative Name/Title: Jason vonEhr, Senior Health Physicist

Subject: Clarifications Regarding Attestations for MC 635844 and Suspended Status

Discussion: The above-quoted licensee requested an existing AU, Jorge Toro Ramirez, M.D., be approved for an expanded authorized user (10 CFR 35.300) with a letter dated June 9, 2023 (ADAMS Accession No. ML23160A192), as supplemented with a letter dated July 14, 2023 (ADAMS Accession No. ML23320A162). This amendment request was suspended on August 15, 2023 (ADAMS Accession No. ML23235A233), due to the expectation by the licensee that information requested by the NRC (ADAMS Accession No. ML23194A052) would require extensive coordination, communication, and time to resolve.

In an email dated November 10, 2023, the licensee submitted a Form 313A(AUT) dated November 8, 2023 (ADAMS Accession No. ML23235A233), providing the training and experience of the subject AU. This form appeared to contain some errors in its communication of the attesting individual's authorizations as well as the authorizations of the associated residency program. In addition, the attesting individual, David C. Brandon, M.D., Residence Program Director of Emory University, was identified online via a simple search of Emory University School of Medicine as having become the nuclear medicine residency director in 2011, well after the subject AU's education and casework claimed at Emory University (July 1998- June 2000).

Mr. Jason vonEhr of the NRC reached out to Dr. Brandon on November 16, 2023, to discuss these items and to assess Dr. Brandon's basis of confidence to attest to the subject AU's training and experience, which appeared to have occurred well before Dr. Brandon's own training and education, or appointment to the position of Director of the Residency Program at Emory University. Dr. Brandon stated that he was able to confirm the adequacy of the subject AU's education and experience through a review of contemporary records of the subject AU's education and the number, type, and adequacy of the casework. Dr. Brandon confirmed that both he and the residency program were fully authorized across and addressed the State of Georgia equivalent of 10 CFR 35.390, 392, 394, and 396, which addressed some of the errors in the Form 313A(AUT) dated November 8, 2023. Dr. Brandon agreed to provide a brief summary in an email and explained that the appropriate individuals who actually oversaw the casework and were the then-residency directors have since retired (attached).

Action Required: Mr. Jason vonEhr to complete and finalize the requested license amendment consistent with the original request and subsequent documents to expand the subject AU's approval to include 10 CFR 35.300.

Through the documentation of this record, the license amendment request suspension is considered withdrawn upon the November 16, 2023, technical review of the licensee's final submission made on November 10, 2023, therefore Milestone 9 will be entered into WBL for this mail control.

SUNSI REVIEW		
Document Availability:	<input checked="" type="checkbox"/> Public	or <input type="checkbox"/> Non-Public
Document Sensitivity: <i>(select "1" value to the right)</i>	<input checked="" type="checkbox"/> Non-Sensitive	<input type="checkbox"/> MD 3.4 Non-Public B.1 (Non-Sensitive)
	<input type="checkbox"/> Non-Sensitive Copyright	<input type="checkbox"/> MD 3.4 Non-Public A.3 (Sensitive Security Related
	<input type="checkbox"/> Sensitive – Proprietary	<input type="checkbox"/> MD 3.4 Non-Public A.4 (Sensitive Proprietary
	<input type="checkbox"/> Sensitive – Privacy Act (includes Personally Identifiable Information (PII))	<input type="checkbox"/> MD 3.4 Non-Public A.5 (Sensitive-Privacy Act)
	<input type="checkbox"/> Sensitive – Internal, Periodic Review required (All Other Sensitive Internal Info.)	<input type="checkbox"/> MD 3.4 Non-Public A.6 (Sensitive-Federal, State, etc)
	<input type="checkbox"/> Sensitive – Security-Related-Periodic Review Required	<input type="checkbox"/> MD 3.4 Non-Public A.7 (Internal)
SUNSI Review Completed by: JEV		

From: [Brandon, David](#)
To: [Jason VonEhr](#)
Subject: [External_Sender] RE: Toro Ramirez 313A
Date: Thursday, November 16, 2023 9:36:10 AM

Good Morning Mr. Von Her,

Following up on our call about Dr. Toro Ramirez's 313A (AUT), the data on the form was extracted from his resident file. A summary letter detailed his physics hours and listed the therapies he participated in. The summary letter and written evaluations in the file stated that he performed well during the residency without an adverse note in his file.

The physicians running the residency program in 1998-2000 have retired. Therefore I am attesting to the data on the NRC 313A form based on documents in the resident file.

If there is any other information that you need, please let me know.

Regards,

David Brandon, MD
Associate Professor, Radiology div. Nuclear Medicine
Program Director, Nuclear Medicine Residency and Nuclear Radiology Fellowship
Emory University/Atlanta VAMC
Cell 404-218-1339