



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

Date: November 20, 2023

License No. 52-35242-02

Docket No.(no hyphens): 03038890

Mail Control/Report No. 635887

Licensee Name: Centro Comprensivo de Cancer de la UPR

Participant(s) Name/Title: Carmelo Perez, Consultant RSO

Work Telephone No. N/A

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

Subject: Regarding Licensee Response to RAI2 dated November 7, 2023

Discussion: The above-quoted licensee submitted an expansive response to the above-quoted Request for Additional Information (RAI)(ADAMS Accession No. ML23319A348), with a hard-copy received in NRC Region I on November 17, 2023. On review of the contents, Mr. vonEhr identified significant portions which were not responsive or not applicable to the license renewal being sought (MC 635887) and/or duplicative with itself. Mr. vonEhr called Mr. Carmelo Perez, the consultant RSO, to discuss the extraneous information that was submitted and confirm Mr. vonEhr's understanding that it was unrelated or unnecessary to the current licensing action. Mr. Carmelo Perez consented to the separation of information material to the NRC license renewal and the information which was deemed extraneous. Both the "retained" and "separated" material were sent to Mr. Carmelo Perez for his review and records.

The extraneous information included:

- the portions of the licensee's September 13, 2017 (ADAMS Accession No. ML17268A313) amendment request *unrelated* to the PET/CT Shielding Evaluation (limited to Attachment A2),
- A response to a 2016 NRC RAI (ADAMS Accession No. ML16204A195), unrelated to the HDR Shielding Evaluation (limited to the Landauer Medical Physics Report and radiation survey results), which included HDR training documents, SSDRs, and dosimetry/public dose evaluations and demonstrations,
- Duplicate copies of the HDR radiation survey results, and
- DOT Hazmat training (duplicated);

Two further items were noted by Mr. vonEhr to Mr. Carmelo Perez:

- **First**: the revised HDR Daily QA Checklist/Procedure. CCCUPR revised this procedure to include an HDR source exposure light check consistent with the NRC's RAI, Item 5, and pursuant to 10 CFR 35.643. However, the HDR Daily QA Checklist/Procedure was also revised to include a backup battery check and source position indicator. These appear to have been incorporated in error, as the NRC's RAI2 Item 6 noted that these elements were not among those in the HDR Full Calibration procedure pursuant to 10 CFR 35.633, and

furthermore the HDR Full Calibration was not requested to be submitted with the License Renewal Application and is not part of the licensee responses described by NUREG-1556, Volume 9, Revision 3, Section 8.9.4. While the licensee may always choose to do more than is described in the regulations, these extra items have the appearance of being added in error and misunderstanding the NRC’s RAI dated October 26, 2023.

- **Second:** the submission included a revised HDR Emergency Procedure. The licensee previously provided an emergency response procedure for the HDR in response to the NRC’s first RAI dated September 7, 2023 (ADAMS Accession No. ML23250A289), Item 11. The licensee’s response was deemed materially adequate and responsive to the NUREG and underlying regulation (10 CFR 35.610(a)(4)). As such, this revised procedure was not requested as part of the NRC’s RAI2. Mr. Carmelo Perez stated during the November 20, 2023, phone call that this procedure was revised to add the names/phone numbers of additional AUs/AMPs to the procedure. The November 7, 2023, submission also included two outdated NRC numbers (whereas the original was not similarly flawed): namely the NRC Region II office, which used to have jurisdiction in Puerto Rico, as well as the NRC’s 24-hour emergency hotline, but with an incorrect number. While this procedure will be accepted for the purpose of renewing the license (it did not change any of the material content of the originally-submitted manufacturer-provided emergency procedure), the licensee was strongly encouraged to review and, as necessary, revise the procedure in use (e.g. at the control panel) and within its records to reflect the correct Region I and phone number as well as the correct NRC 24-hour emergency hotline.

Action Required: Mr. vonEhr cleaved the information necessary to be retained from the remainder of the licensee’s November 7, 2023, submission and uploaded independent copies of both the retained/removed information to ADAMS (Retained: ADAMS Accession No. ML23324A375, removed: ADAMS Accession No. ML23324A376). The original full scan will be retained in ADAMS (save for the removal of approximately 100 blank pages which resulted from scanning the document double-sided when only a limited portion of the submission was double-sided (ADAMS Accession No. ML23319A348)). The “retained” document will be tied to the NRC license and thus complete the renewal process.

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