

July 9, 2024

Zahid Sulaiman, Health Physicist
US Nuclear Regulatory Commission, Region III
Division of Radiological Safety and Security
2443 Warrenville Rd., Suite 210
Lisle, IL 60532

RE: Response to the Apparent Violation, Inspection Report No. 03035774/2024001(DRSS);
EA-24-019

Dear Mr. Sulaiman,

This is to provide a written response to your request for information via email dated July 2, 2024.

1. With regard to the corrective actions in updating the procedures taken when mobile units require repairs, there will be several steps implemented in these scenarios.

A preliminary planning meeting will take place where the type of repair, the time needed for repair, and the unit specifics will be reviewed. The planning review will include personnel from asset management, local operations and the radiation safety officer.

Determination will be made to remove the radioactive materials on the mobile unit based on the type and severity of repairs that are required. If repair is limited to the scan room or control room, or exterior surface of the mobile unit, sources of radiation can be secured within the hot lab during repairs. In some cases, all radioactive materials may need to be removed from the mobile unit and secured on another authorized mobile unit or another authorized location.

2. Operations and asset management staff will be trained on the new policy at implementation and annually, as part of the required annual policy review. The policy will be presented to the Operations Team at the next Manager of Operations conference call, which occurs monthly. The next call is July 29th. In addition, I will present the new policy on the bi-weekly Leadership conference call this Friday July 10th.

Please do not hesitate to contact me if you require further clarification or information.

Sincerely,



Kay Kassel, MS CNMT NMTCB(RS)
Corporate Radiation Safety Officer
Akumin
Kay.kassel@akumin.com
561-701-1311

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Dear Mr. Sulaiman,

This is to provide a written response to your request for information vial email dated July 10, 2024.

1. With regard to the hot lab key:

The hot lab door key is outside of the trailer in a cypher lock box. There is a code to enter on the box that releases the hot lab key. The box with the cypher code is not accessible to anyone other than Akumin authorized individuals.

2. With regard to maintenance facility training:

The instructions to the repair facility will be to not enter the hot lab at any time. The hot lab postings will remain as-is, and it will be unable to be accessed by anyone other than Akumin authorized individuals.

Please do not hesitate to contact me if you require further clarification or information.

Sincerely,



Kay Kassel, MS CNMT NMTCB(RS)
Corporate Radiation Safety Officer
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