HAWAIʻI PACIFIC HEALTH

KAPIʻOLANI
PALI MOMI
STRAUB
WILCOX

RECEIVED
08/22/2024

Mail Control Number: 642516
Docket Number : 3031200
License Number : 53-23297-01
Licensee Name : Hawaii Pacific Health, Inc.
ML24236A045

August 21, 2024

Nuclear Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region IV
1600 E. Lamar Blvd.
Arlington, TX 76011-4511

Subject: Amendment
NRC License No. 53-23297-01
Docket No. 030-31200

Dear License Reviewer:

We are requesting that Mykol Larvie, M.D. be added as an Authorized User for byproduct material listed in 10 CFR 35.100, 10 CFR 35.200, and 10 CFR 35.300. Dr. Larvie was authorized for these uses under Hybrid Materials License 21-04127-02 issued to VHS Harper-Hutzel Hospital, Inc. A copy of the document listing him as an Authorized User is enclosed.

We are also requesting that Michael Chervonski, M.D. be added as an Authorized User for byproduct material listed in 10 CFR 35.100, 10 CFR 35.200, and oral administration of sodium iodide I-131. Dr. Chervonski was authorized for these uses under California Radioactive Materials License 0563-40 issued to Sierra Vista Hospital, Inc. A copy of this license is enclosed.

If you require any additional information please contact our Radiation Safety Officer, Ronald Frick, at (808) 373-7009.

Sincerely,

Raymond P. Vara, Jr.
President & CEO

Enclosures

DMC
Harper University Hospital
Hutzel Women's Hospital

September 9, 2022

Mykol Larvie, M.D.
Department of Radiology
Harper University Hospital
3990 John R
Detroit, MI 48124

Re: Authorized User Status

Dr. Larvie:

We are pleased to confirm that, as authorized by the U.S. Nuclear Regulatory Commission, the Radiation Safety Committee of VHS Harper – Hutzel Hospital has granted you authorized use privileges as an approved Authorized User on our Material's License 21-04127-02 as follows:

Mykol Larvie, MD, PhD

- Approved for 10 CFR 35.100, 35.200, 35.300. 35:1000 (Y-90 TheraSpheres)

If you require any additional information or have any questions concerning this matter, please contact me.

Sincerely,

Richard N. Joyrich, M.D., ABNM
Chair, Radiation Safety Committee
Material's License: 21-04127-02

Joel Rogers, MS, DABR
Radiation Safety Officer

DMC
Harper University Hospital
DETROIT MEDICAL CENTER / WAYNE STATE UNIVERSITY

HYBRID MATERIAL LICENSE 21-04127-02
AUTHORIZED PHYSICIAN USERS

HUMAN USE – 10 CFR 35.100, 35.200, 35.300, 35.500, 35.1000 **February 13, 2023**

Richard N. Joyrich, M.D., ABNM	35.100, 35.200, 35.300, 35.500, 35.1000 TheraSpheres
Cheryl Grigorian, M.D., ABR	35.100, 35.200, 35.300 (limited to oral administration of sodium iodide I-131), 35.300 Ra-223 (Xofigo)
Jeffery J. Critchfield, M.D., ABR (IR)	35.1000 TheraSpheres
Gulcin Altinok, M.D., ABNM, ABR	35.100, 35.200, 35.300
Foaz Kayali, M.D.	35.100, 35.200, 35.300 (limited to oral administration of sodium iodide I-131)
Hani Abujudeh, M.D.	35.100, 35.200, 35.300 (limited to oral administration of sodium iodide I-131)
Mykol Larvie, M.D.	35.100, 35.200, 35.300, 35.1000

HUMAN USE – 10 CFR 35.200 Nuclear Cardiology Only

Luis C. Afonso, M.D.
Anupama Kottam, M.D., CBNC
Aiden Abidov, M.D., CBNC

BLOOD BANK IRRADIATOR – GAMMACELL 3000 ELAN

Tammon A. Nash, M.D.
James J. Fiedor, M.T.

HUMAN USE – RESEARCH

Principal Investigator	Radiopharmaceutical	Use	FDA/ Phase	Approval AU

NO ACTIVE PRINCIPAL INVESTIGATORS

HUMAN USE – IN VITRO (Prin. Investigator, Contact)

Principal Investigator	Radiopharmaceutical	Use	FDA/ Phase	Approval AU

NO ACTIVE PRINCIPAL INVESTIGATORS

Joel Rogers, MS. DABR
Medical Physicist/Radiation Safety Officer

RADIOACTIVE MATERIAL LICENSE

Pursuant to the California Code of Regulations, Division 1, Title 17, Chapter 5, Subchapter 4, Group 2, Licensing of Radioactive Material, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, use, possess, transfer, or dispose of radioactive material listed below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules, regulations, and orders of the California Department of Public Health now or hereafter in effect and to any standard or specific condition specified in this license.

1. Licensee:	SIERRA VISTA HOSPITAL INC DBA SIERRA VISTA REGIONAL MEDICAL CENTER	*3. License Number:* 0563-40	*Amendment Number:* 71
2. Address:	1010 MURRAY AVENUE SAN LUIS OBISPO CA 93405	*4. Expiration date:* July 26, 2024	(2)
Attention:	TIMOTHY AURAN MD RADIATION SAFETY OFFICER	*5. Inspection agency:*	Radiologic Health Branch North

License Number 0563-40 is hereby amended as follows:

6. Nuclide	7. Form	8. Possession Limit
A. Any radioactive material permitted by 10 CFR 35.100, 35.200 and sodium iodide I-131 permitted by 10 CFR 35.300.	A. Any Excluding Xenon	A. Combined possession limit not to exceed 74 GBq (2 Ci).
B. Radioactive material permitted by 10 CFR 35.400 as specified below:	B.	B.
1. Iodine-125	1. Seeds	1. Total 3.7 GBq (100 mCi), no single seed to exceed 55.5 MBq (1.5 mCi).
2. Iridium-192	2. Seeds	2. Total 7.4 GBq (200 mCi), no single seed to exceed 55.5 MBq (1.5 mCi).
3. Palladium-103	3. Seeds	3. Total 7.4 GBq (200 mCi), no single seed to exceed 55.5 MBq (1.5 mCi).
C. Radioactive material permitted by 10 CFR 35.1000 as specified below:	C.	C.
1. Yttrium-90	1. Microspheres (Sirtex Medical Limited Model SIR-Spheres)	1. Total not to exceed **111** GBq (**3 Ci**). Each source vial not to exceed **15** GBq (**405 mCi**).
2. Yttrium-90	2. Microspheres (MDS Nordion Inc. Model TheraSpheres)	2. Total not to exceed 74 GBq (2 Ci). Each source vial not to exceed 20 GBq (540 mCi).

RADIOACTIVE MATERIAL LICENSE

License Number: 0563-40

Amendment Number: 71

6. Nuclide	7. Form	8. Possession Limit
D. 1. Any radionuclide with atomic numbers 3-83, inclusive, except: Strontium-90 and Lead-210.	D. 1. Sealed or solid sources manufactured in accordance with a specific license issued by the United States Nuclear Regulatory Commission, an Agreement State or a Licensing State.	D. 1. Total not to exceed 740 MBq (20 mCi). Each source not to exceed 555 MBq (15 mCi).
2. Technetium-99m	2. Liquid	2. Total not to exceed 7.4 GBq (200 mCi).
3. Thallium-201	3. Liquid	3. Total not to exceed 740 MBq (20 mCi).
4. Gallium-67	4. Liquid	4. Total not to exceed 740 MBq (20 mCi).
5. Cesium-137	5. Sealed sources	5. Total 20 GBq (540 mCi), in 12 sources, no single source to exceed 3.7 GBq (100 mCi).

9. Authorized Use

A. Any uptake, dilution or excretion study permitted by 10 CFR 35.100.

Any imaging and localization study permitted by 10 CFR 35.200.

Oral administration of sodium iodide I-131 only as permitted by 10 CFR 35.300

B. 1.-3 Any manual brachytherapy permitted by 10 CFR 35.400.

C. 1. To be used in the Sirtex Medical Limited Model SIR-Spheres device for intravascular brachytherapy treatments permitted by 10 CFR 35.1000.

2. To be used in a Nordion, Inc. TheraSphere Mark III Administration Set and Accessory Kit for intravascular brachytherapy treatments permitted by 10 CFR 35.1000.

D. 1.-4. Marker and calibration sources.

5. Storage only.

LICENSE CONDITIONS

10. Radioactive material shall be used only at the following approved location:

(1) 1010 Murray Avenue, San Luis Obispo, CA.

RADIOACTIVE MATERIAL LICENSE

License Number: 0563-40

Amendment Number: 71

11. This license is subject to an annual fee for sources of radioactive material authorized to be possessed at any one time as specified in Items 6, 7, 8 and 9 of this license. The annual fee for this license is required by and computed in accordance with Title 17, California Code of Regulations, Sections **30230-30231** and is also subject to an annual cost-of-living adjustment pursuant to Section 100425 of the California Health and Safety Code.

12. (a) The individuals named below are authorized the specific uses of radioactive material described in Items 6, 7, 8, and 9 of this license as follows:

(1) Jonathan R. Stella, M.D.	35.400
(2) Arthur C. Duberg, M.D.	35.100; 35.200 and 9.D.1.-4.
(3) Jeffrey M. Rodnick, M.D.	35.400
(4) Erik M. Olsen, M.D.	35.100; 35.200 and 9.D.1.-4.
(5) William C. Burnette Jr., M.D.	35.100; 35.200 and 9.D.1.-4.
(6) Stephen R. Holtzman, M.D.	35.100; 35.200; 35.300 for oral administration of sodium iodide I-131 only and 9.D.1.-4.
(7) Timothy Auran, M.D.	35.100; 35.200; 35.300 for oral administration of sodium iodide I-131 only; 35.1000 for Y-90 SIR-Spheres and Therasphere and 9.D.1.-4.
(8) David J. Tuttle, M.D.	35.100; 35.200; 35.300 for oral administration of sodium iodide I-131 in quantities less than or equal to 1.2 gigabecquerels (33 millicuries) only and 9.D.1.-4.
(9) Mark A. Ziemba, M.D.	35.100; 35.200; 35.300 for oral administration of sodium iodide I-131 only and 9.D.1.-4.
(10) Jaywant P. Parmar, M.D.	35.100; 35.200 and 9.D.1.-4.
(11) Linda Dickenson Mulder, M.D.	35.100; 35.200 and 9.D.1.-4.
(12) Timothy Davis, M.D.	35.100; 35.200; 35.300 for oral administration of sodium iodide I-131 and 9.D.1.-4.
(13) Felix Yap, M.D.	35.100; 35.200; 35.300 for oral administration of sodium iodide I-131 and 9.D.1.-4.
(14) Michael Chervonski, M.D.	35.100; 35.200; 35.300 for oral administration of sodium iodide I-131 only; 35.1000 for Ytrium-90 Therasphere and 9.D.1.-4.
(15) **Brady J. Banta, M.D.**	**35.100; 35.200 and 9.D.1.-4.**
(16) **Ramanjyot Kaur Muhar, M.D.**	**35.100; 35.200; 35.300 for oral administration of sodium iodide I-131 and 9.D.1.-4.**
(17) **Lourdes D. Alanis, M.D.**	**35.100; 35.200; 35.300 for oral administration of sodium iodide I-131 and 9.D.1.-4.**

(b) Radioactive material may be used by the following individuals for physical measurements only:

(1) Joe T. Wong, M.S.
(2) Kristin J. Garcia, M.S.

RADIOACTIVE MATERIAL LICENSE

License Number: 0563-40

Amendment Number: 71

13. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Items 6, 7, 8 and 9 of this license in accordance with the statements, representations, and procedures contained in the documents listed below. The Department's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.

    (a) The License Renewal Application, with attachments, dated July 21, 2009; signed by Candice Markwith, Chief Executive Officer, as supplemented by the letters, with attachments, dated June 30, 2014, and August 18, 2014, both signed by Donna Wininghan, M.D., Radiation Safety Officer.

    (b) The Medical Radiation Safety Officer Training and Experience and Preceptor Attestation Form, dated June 30, 2015, signed by Ikenna Mmeje, Chief Operating Officer, and the Duties and Responsibilities of the Radiation Safety Officer and Delegation of Authority Form, dated August 24, 2015, signed by Ikenna "Ike" Mmeje, Chief Operating Officer and Timothy Auran, M.D., regarding the appointment of the new Radiation Safety Officer.

    (c) The letters, both with attachments, dated October 27, 2017, and January 19, 2018, both signed by Timothy Auran, M.D., Radiation Safety Officer, regarding the addition of Sirtex Medical Limited SIR-Spheres for intravascular brachytherapy treatments, with associated procedures and commitments.

    (d) The letter, with attachments, dated June 4, 2018, signed by Timothy Auran, M.D., Radiation Safety Officer, regarding the addition of Nordion Inc. Model TheraSpheres for intravascular brachytherapy treatments, with associated procedures and commitments.

    (e) **The letter, with attachments, dated September 19, 2023, signed by Mark Lisa, Chief Executive Officer, regarding the updating of the physical inventory, and record keeping requirements for SIR-Spheres.**

14. (a) The Radiation Safety Officer in this program shall be Timothy Auran, M.D.
    (b) The Chairperson of the Radiation Safety Committee shall be Timothy Auran, M.D.

15. Sealed sources possessed under this license shall be tested for leakage and/or contamination as required by Title 17, California Code of Regulations, Section 30275 (c).

16. In lieu of the leak test intervals required by **Title 17, California Code of Regulations,** Section 30275 (c), sealed sources can be tested for leakage and/or contamination at longer intervals when they are specified in a certificate of registration issued by the U.S. Nuclear Regulatory Commission, an Agreement State or a Licensing State. When a longer interval stipulated in a certificate of registration is used, the certificate must be maintained on file and available for inspection for as long as the associated leak test records are retained.

17. Quantitative analytical assays for the purpose of tests for leakage and/or contamination of sealed sources shall be performed only by persons specifically authorized to perform that service.

18. The following individuals are authorized to collect wipe test samples of sealed sources possessed under this license using leak test kits acceptable to the California Department of Public Health.

    (a) The Radiation Safety Officer
    (b) Qualified individuals designated in writing by the Radiation Safety Officer

19. **Except for alpha sources, the periodic leak test required by Condition 15 does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another person unless they have been leak tested within six months prior to the date of use or transfer.**

20. The licensee shall conduct a physical inventory every six months to account for all sealed sources and/or devices received and possessed under the license. Records of the inventories shall be maintained for inspection, and may be disposed of following Department inspection.

21. The licensee is authorized to hold radioactive materials with a physical half-life of less than or equal to 120 days for decay in storage before disposal in ordinary trash provided:

    (a) Radioactive waste to be disposed of in this manner shall be held for decay in storage for at least 10 half-lives.

    (b) Before disposal as normal waste, radioactive waste shall be surveyed to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.

    (c) Records shall be maintained of the disposal of licensed materials made by decay in storage. These records shall be sufficient to demonstrate compliance with this license condition and shall be retained for 3 years after the record is made.

    (d) Generator columns shall be segregated so that they may be monitored separately to ensure decay to background levels prior to disposal.

22. Nuclear medicine technology procedures shall be performed by nuclear medicine technologists pursuant to Title 17, California Code of Regulations, Subchapter 4.7. Such procedures shall be performed under the supervision of authorized user physicians on this license who meet the criteria specified in Section 30510. Certificates or special permits issued pursuant to Subchapter 4.7 shall be prominently displayed at the facility(ies) authorized on this license.

23. **Prior to administering Iodine-131 in quantities than 1.11 MBq (30 uCi) or prior to performing therapeutic procedures of both using sealed or unsealed radioactive material the licensee must comply with the requirements in 10 CFR 35.40 and 10 CFR 35.41 incorporated by reference in Title 17, California Code of Regulations, Section 30195(a), including but not limited to, the following:**

    (a) Develop, implement and maintain written procedures that ensure the following:

        (1) The patient's or human research subject's identity is verified before each administration.

        (2) Each administration is in accordance with the treatment plan, if applicable, and written directive.

        (3) Both the manual and computer-generated dose calculations have been checked.

        (4) The computer-generated dose calculations have been correctly transferred into the consoles of therapeutic medical units authorized by 35.1000.

    (b) Retain a copy of the written procedures for the duration of the license per 10 CFR 35.2041.

24. For a period not to exceed 60 days in any calendar year, a physician is authorized to use licensed materials for human use under the terms of this license, provided the physician:

    (a) Has the prior written permission of the Licensee's Executive Management and its Radiation Safety Officer.

    (b) Is specifically named as an authorized user on a current and valid U.S. Nuclear Regulatory Commission, an Agreement State or a Licensing State license authorizing human use.

    (c) Performs only those procedures for which the physician is specifically authorized by the U.S. Nuclear Regulatory Commission, an Agreement State or a Licensing State license.

RADIOACTIVE MATERIAL LICENSE

License Number: 0563-40

Amendment Number: 71

The licensee shall maintain for inspection copies of the written permission specified in (a) above and the licensee(s) specified in (b) and (c) above. These records shall be maintained for five years from the time the licensee grants its permission under (a) above.

25. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material so that at no time will the total quantity of radioactive material possessed require financial surety for decommissioning in accordance with the **Title 17, California Code of Regulations** (17 CCR), Section 30195.1. A value of 3.7 megabecquerels (100 microcuries) is assigned to cobalt-57 to supplement 17 CCR Section 30197.7.

26. In accordance with California Health and Safety Code Section 115000.1(h), the licensee shall annually report the radioactive waste inventory held in storage on December 31 of each year and all manifests of Low Level Radioactive Waste (LLRW) shipments to licensed LLRW disposal facilities made during the year to the Department via the online LLRW Tracking System at https://llrwts.cdph.ca.gov/.

27. At least 30 days prior to vacating any address of use listed in Condition 10 of this license, the licensee shall provide written notification of intent to vacate to the California Department of Public Health, in accordance with Title 17, California Code of Regulations **(17 CCR),** Section 30256 (b). Control of all licensed areas must be maintained until such areas are released by the Department for unrestricted use or the license is terminated, in accordance with **17 CCR** Section 30256 (j).

28. A copy of this license and a copy of all records and documents pertaining to this license shall be maintained available for inspection at 1010 Murray Avenue, San Luis Obispo, CA.

Issued for the State of California Department of Public Health

Date: February 14, 2024

By: Hugh Clowers

Radiologic Health Branch
MS 7610, P.O. Box 997414
Sacramento, CA 95899-7414

From: Ronald Frick
To: R4 Licensing Action Submittals
Subject: [External_Sender] License amendment for Hawaii Pacific Health
Date: Thursday, August 22, 2024 5:26:09 PM
Attachments: NRC amendment aug24.pdf

Dear license reviewer,

Attached is a license amendment request for Hawaii Pacific Health.

Please contact me if you need additional information.

Thank you,

Ron Frick
rfrick@gammamedphys.com
808-282-0169

NRC FORM 532
(05-2016)

U.S. NUCLEAR REGULATORY COMMISSION

ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

Name and Address of Applicant and/or Licensee

Raymond P. Vara, Jr.
President and CEO
Hawaii Pacific Health, Inc.
98-1079 Moanalua Road
Aiea, HI 96701

Date
08/23/2024

License Number(s)
53-23297-01

Mail Control Number(s)
642516

Licensing and/or Technical Reviewer or Branch
C. Hill

This is to acknowledge receipt of your: ☑ **Letter and/or** ☐ **Application** **Dated:** 08/21/2024

The initial processing, which included an administrative review, has been performed.

☑ **Amendment** ☐ **Termination** ☐ **New License** ☐ **Renewal**

☐ **There were no administrative omissions identified during our initial review.**

☐ **This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.**

☐ **Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link:** http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf

Follow the instructions on the form for submission.

☐ **The following administrative omissions have been identified:**

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Region IV
U. S. Nuclear Regulatory Commission
DNMS/NMSB - B
1600 E. Lamar Boulevard
Arlington, TX 76011-4511
(817) 200-1103 or (817) 200-1140

BETWEEN:

Accounts Receivable/Payable
and
Regional Licensing Branches

[FOR ARPB USE]
INFORMATION FROM WBL

Program Code: 02120
Status Code: Pending Amendment
Fee Category:7C
Exp. Date: 08/31/2025
Fee Comments: 3E EFF 5/5/95
Decom Fin Assur Reqd: N

License Fee Worksheet - License Fee Transmittal

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee:	Hawaii Pacific Health, Inc.
Received Date:	08/22/2024
Docket Number:	3031200
Mail Control Number:	642516
License Number:	53-23297-01
Action Type:	Amendment

2. FEE ATTACHED

Amount: N/A

Check No.: N/A

3. COMMENTS

Signed: Carol L. Hill

Date: 08/23/2024

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / /)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:

Amendment: _____

Renewal: _____

License: _____

3. OTHER _____

_____

Signed: _____

Date: _____

R1201021

Agency: NRC

Web-Based Licensing System

WBL WORKSHEET

DATE: 08/23/2024

DOCKET NUMBER: 3031200 LICENSE NUMBER: 53-23297-01 STATUS: Pending Amendment

MAIL CONTROL NUMBER: 642516 RECEIPT DATE: 08/22/2024 ACTION TYPE: Amendment

DUE DATE: 11/20/2024 INST. CODE: 23297 LICENSE REGION: Region 4

LICENSE TYPE: 30 ENTITY TYPE: C LICENSE GROUP: Medical

ISSUE DATE: ORIGINAL DATE: 08/29/1989 EXPIRATION DATE: 08/31/2025

DECOMMISSIONING CATEGORY: Group 2 LAST ISSUE DATE:

LICENSEE NAME: Hawaii Pacific Health, Inc. DECOM FIN ASSUR REQD: N
SUBM: N

MAILING ADDRESS LINE1: 98-1079 Moanalua Road CONT PLAN REQD: N APPRV: N

MAILING ADDRESS LINE 2:

CITY: Aiea STATE: HI ZIP: 96701

CONTACT PERSON: PREFIX: FIRST NAME: Raymond MIDDLE INITIAL: P.

LAST NAME: Vara SUFFIX: Jr.

JOB TITLE: President & CEO PHONE: 808-486-6000 FAX: EMAIL: rvara@straub.net

BILLING ADDRESS LINE 1:

BILLING ADDRESS LINE 2:

CITY: STATE: Hawaii ZIP:

BILLING CONTACT PERSON: FIRST NAME: MIDDLE INITIAL: LAST NAME:

PHONE: EMAIL: FAX:

PRIMARY PGM CODE: 02120 SECONDARY PGM CODE:

INSPECTION REGION: Region 4 PRIORITY: 3

RSO: PREFIX: FIRST NAME: Ronald MIDDLE INITIAL: W. LAST NAME Frick

SUFFIX: M.S., CHP, DABR RSO JOB TITLE:

RSO PHONE: 808-373-7009 RSO FAX: 808-373-7017 RSO EMAIL: rfrick@gammamedphys.com

STATES WHERE USE IS AUTHORIZED: 1

0- ALL LISTED STATES
1- SAME AS STATE IN ADDRESS
2- ALL STATES
3- NON-AGREEMENT-STATES

AUTHORIZED STATES (USE ONLY IF ABOVE IS ZERO):