



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD – SUITE 102  
KING OF PRUSSIA, PA 19406-1415

September 5, 2024

Cami Still, Director, Health Physics  
Nuclear & Precision Health Solutions  
Cardinal Health P.R. 120, Inc.  
DBA Nuclear & Precision Health Solutions  
7000 Cardinal Place  
Dublin, OH 43017

**SUBJECT: CARDINAL HEALTH P.R. 120, INC., REQUEST FOR ADDITIONAL  
INFORMATION, MAIL CONTROL NO. 642029**

Dear Cami Still:

This is in reference to your letters dated July 25 and August 20, 2024, requesting to amend NRC License No. 34-31473-02MD. In order to continue our review, we need the following additional information:

1. Regarding the letter dated July 25, 2024, and its request to add Shirley J. Danner, R.Ph as the Radiation Safety Officer (RSO) on NRC License No. 34-31473-02MD: Please provide contact information, including phone, email, and if applicable, work cell phone, for Shirley Danner, to be noted in the NRC file for the license.
2. Regarding the letter dated July 25, 2024: the NRC will strike Section 10.19 of your letter dated September 14, 2022, tied to your license as License Condition 19.B, as it pertains to services performed under NRC License No. 34-31473-02MD as a service to other licensees. As you indicated this will result in the remove the secondary program code 03255 "Other Services - Source Less Than Or Equal To 100 Curies" and its associated fee category (3N).

While not specifically identified in your request, it is the understanding of the NRC that License Conditions 6/7/8/9.N will need to be removed, as this authorization solely dealt with the provision of these services. Similarly, the NRC further understands that the removal of your temporary job site authorization under License Condition 10 would be consistent with your request. Please confirm that this is consistent with your understanding of your future needs and authorizations to address them.

***Note: leak test services and dose calibrator quality assurance testing are commonly performed by consultants for clients under the client license. The removal of this authorization precludes Cardinal Health P.R. 120, Inc., from performing these services under NRC License No. 34-31473-02MD but does not prevent or prohibit the provision of these services under the client's NRC or Agreement State license, so long as that license maintains the applicable authorizations to do so and Cardinal Health P.R. 120, Inc., LLC creates and provides sufficient records for the client to maintain for its own regulatory compliance.***

3. Regarding your letter dated August 20, 2024, naming David W. Pellicciarini, CHP, as the Corporate RSO. NRC License No. 34-31473-02MD is proposed to name Shirley Danner as the RSO, consistent with your letter dated July 25, 2024, and the NRC does not identify further contacts on its radiopharmacy licenses. Nonetheless, the NRC does maintain a licensee management contact within our records both to anticipate the anticipated signatory for incoming licensing requests and to address NRC correspondence, including annual license fees. At the present, you, Cami Still, are noted in our records for NRC License No. 34-31473-02MD as the management contact. Please clarify if you wish to change the management contact to the Corporate RSO, David W. Pellicciarini, CHP, and if so, please provide complete contact information so that we can update our files.
4. Regarding your letter dated August 20, 2024, and the proper name of the license listed in NRC License No. 34-31473-02MD: Evan Western of Cardinal Health provided the proper name of the NRC license in an email to the NRC dated March 6, 2023.
  - a. Please confirm that this is a name-change only and clarifies the licensed entity rather than any change in organization or control, such as described in NUREG-1556, Volume 15, Revision 1.
  - b. Please confirm the full name and mailing address to be shown in License Condition 1 (licensee name) and 2 (mailing address) of the NRC License. We have prepared what we believe to be your desired end-condition below. Please note that "DBA" is typically representing "doing-business-as" (presented in the lowercase), which we discussed during the call on September 5, 2024, may not be the case.

License Condition 1: Cardinal Health P.R. 120, Inc.  
dba Nuclear & Precision Health Solutions

License Condition 2: 7000 Cardinal Place  
Dublin, OH 43017

We will continue our review upon receipt of this information. Please reply to my attention at:

[R1DRSSMail.Resource@nrc.gov](mailto:R1DRSSMail.Resource@nrc.gov)  
Reference – Jason vonEhr  
Mail Control No. 642029

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: [www.nrc.gov](http://www.nrc.gov). Additional information regarding medical uses of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/med-use-toolkit.html>. This site also provides the updated Training and Experience NRC Form 313A series of forms and guidance, as well as information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that

certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at (610) 337-5256 or via electronic mail at [Jason.vonEhr@nrc.gov](mailto:Jason.vonEhr@nrc.gov).

Thank you for your cooperation.

Sincerely,

Jason vonEhr, Senior Health Physicist  
Medical and Licensing Assistance Branch  
Division of Radiological Safety and Security  
Region I

License No. 34-31473-02MD  
Docket No. 030-38569  
Mail Control No. 642029

cc: Shirley J. Danner, R.Ph, Proposed Radiation Safety Officer

CARDINAL HEALTH P.R. 120, INC., REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 642029 DATED SEPTEMBER 5, 2024

DOCUMENT NAME: G:\WBL Documents\WBL License RAI\L34-31473-02MD.642029.RAI.docx

**SUNSI Review Complete: JEV**

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OFFICE	RI:DRSS	N					
NAME	Jason vonEhr						
DATE	09/05/2024						

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