

From: [Frank Tran](#)
To: ken.wohlt@physics1.com
Subject: Request additional information NRC Materials License No. 24-17477-01 for SSM Regional Health Services
Date: Wednesday, July 10, 2024 3:55:00 PM

Dear Kenneth Wohlt:

This refers to the license renewal application for SSM Regional Health Services, NRC Materials License No. 24-17477-01.

Based on the licensing guidance in NUREG-1556, Volume 20, Revision 1, the NRC will renew a materials license in its entirety. We will need all information as required in NRC Form 313, "Application for Materials License"; 10 CFR 30.32, "Application for specific licenses"; and the applicable licensing guidance. Based on the proposed licensed materials and use in your application, we reviewed your application in accordance with the licensing guidance in NUREG-1556, Volume 9, Revision 3. An electronic copy of the guidance can be downloaded directly from the NRC's website at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v9/index.html>. Based on the review, we will need the following.

1. For 10 CFR 35.200 material for imaging and localization studies, please indicate if Positron Emission Tomography (PET) will be used or not. If PET isotopes will be used, provide a facility diagram indicating the room(s) where PET isotopes will be used and radiation shielding evaluations (include information about the type, thickness, and density of any necessary shielding to enable independent verification of shielding calculations; a description of surrounding areas and above and below the rooms, including the occupancy factors, and indicate whether the areas are restricted or unrestricted; and a description of any portable shields used (including the dimensions of any portable shield, if one is used; source storage safe); and describe the additional equipment for these uses (syringe radiation shielding, tong, etc.), as applicable. The calculations should include the workload assumptions used.
2. We could not read the facility diagram because its resolution was low. Please resubmit the facility diagrams (drawings should be to scale, and the scale used should be indicated; the direction of north should be indicated; location, room numbers, and principal use of each room, including patient treatment rooms where 10 CFR 35.300 material will be used, or area where byproduct material is prepared, used, and stored; principal use of adjacent rooms (e.g., office, file, toilet, closet, hallway), including areas above, beside, and below therapy treatment rooms and PET; doors should be indicated, and specify which doors are access controlled (i.e., locked)).
3. Please indicate if 10 CFR 35.300 will be used for in-patients or out-patients or both. If it will be used for in-patients, provide the radiation shielding for the room(s) (include information about the type, thickness, and density of any necessary shielding to enable independent verification of shielding calculations, and a description of any portable shields used, if one is used (including the dimensions of portable shield); the

calculations should include the workload assumptions used).

4. Please indicate if alpha emitter(s) as permitted by 10 CFR 35.300 will be used or not. If alpha emitter(s) will be used and measurement of alpha emitters where gamma or beta emissions are not measurable in a traditional dose calibrator, provide a description of specialized measurement equipment and the nationally recognized standard used to calibrate the instrument or provide a copy of the manufacturer's instructions to calibrate the instrument.
5. With regards to Item 8, "Training for Individuals Working in or Frequenting Restricted Areas", please provide the following statement: "SSM Regional Health Services has developed and will implement and maintain written procedures for a program for training required under 10 CFR 19.12 for each group of workers, including (i) topics covered, (ii) qualifications of the instructors, (iii) method of training, (iv) method for assessing the success of the training, (v) initial training, and (vi) annual refresher training."
6. Provide a copy of memo of the delegation of authority for the Radiation Safety Officer (RSO). For your reference, a sample of the memo is in Appendix I of NUREG-1556, Volume 9, Rev. 3. In addition, if the proposed RSO is an outside consultant or contractor, please provide the following:
 - a. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of onsite time (hours per week or days per quarter, as appropriate for the program).
 - b. Identify an in-house representative who will serve as the point of contact during the RSO's absence. Provide the contact information (phone and/or email).
 - c. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of the radiation safety program and related regulatory requirements.
 - d. Specify the maximum amount of time it will take the consultant-RSO to arrive at the facility in the event of an emergency that requires his/her presence.

To continue the review of your application, we request that you submit your response under a dated and signed cover letter by August 8, 2024. In the cover letter, please reference the license number and Mail Control No. 641413. If you have questions, require additional time to respond, or require clarification on any of the information stated above, please contact me at 630-829-9623 or reply to this email.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the

NRC's "Rules of Practice," a copy of this correspondence will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

Best regards,

Frank Tran

Senior Health Physicist/License Reviewer

Phone: 630-829-9623

Fax: 630-515-1078

Email: Frank.Tran@nrc.gov



References:

NRC Regulations: <https://www.nrc.gov/reading-rm/doc-collections/cfr/index.html>

NUREG-1556 Series: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/index.html>

NRC Forms: <https://www.nrc.gov/reading-rm/doc-collections/forms/index.html>

NRC License Fees: <https://www.nrc.gov/about-nrc/regulatory/licensing/fees.html>