

**From:** [Jason Kelly](#)  
**To:** [jesse.whitlock@mercy.net](mailto:jesse.whitlock@mercy.net)  
**Subject:** U.S. NRC Materials License #24-00866-02 - Request for Additional Information  
**Date:** Monday, December 23, 2024 2:26:00 PM  
**Attachments:** NUREG-1556, Vol. 9, Rev. 3, Appendix I, ARSO.pdf

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Mr. Whitlock:

As discussed in our telephone conversation, I have reviewed your request dated October 30, 2024, for an amendment to your U.S. Nuclear Regulatory Commission Materials License No. 24-00866-02. Upon review of the request, I identified the following areas in which additional or clarifying information is needed:

1. It appears that your proposed PET/CT Imaging Room has been designed and shielded to accommodate any PET radionuclide, including F-18 FDG. Though, your request did not account for all areas that may be used for patient uptake as is typically required for patients undergoing F-18 FDG diagnostic evaluation. Therefore, please confirm that your institution will limit use to only the PET radionuclides eluted from your strontium/rubidium generator at this time. If you should wish to expand use of the area for other PET radionuclides, including F-18 FDG, in the future, please confirm that you will request a license amendment with a complete shielding evaluation accounting for all areas, including patient uptake and the imaging room.
2. Please resubmit your PET/CT Imaging Room shielding evaluation, clearly identifying the distances, shielding material and thickness, controlled versus uncontrolled areas, and occupancy factors for all adjacent areas. Please provide complete detail, including the maximum activity and total uptake and imaging time. Identify the patient workload, identifying the maximum number of patients per day and the number of days per week. Please identify the values that you used in your calculations for the gamma ray constant and half value layer for the radionuclide(s) of interest.
3. Your request refers to the transfer/disposal of your blood irradiator authorized in Subpart I of Items 6, 7, 8 and 9, of the license. Please provide documentation of the receipt of the transferred cesium-137 sealed sources to Southwest Research Institute. Further, please confirm that the reference to Source S/N #BB 59 in the accompanying Leak Test Report is an internal reference that corresponds to the cesium-137 sources assigned S/Ns #372, 373 and 374.
4. Your request refers to the closure of your licensed facility in Branson, Missouri. Clarify if you transferred and/or disposed any licensed radioactive material (including radioactive waste) formerly stored or used at this location. If applicable, please provide a record of the transfer/disposal. Further, if any sealed sources were subject to leak testing, please also include a current Leak Test Report demonstrating that the sources were not leaking at the time of transfer/disposal. Lastly, identify an overview of the site history. Specifically identify if there ever were any incidents at the licensed facility involving licensed material (e.g., leaking or ruptured sealed sources).
5. Your request refers to the appointment of a proposed Associate RSO. Title 10 of the Code of

Federal Regulations (10 CFR) §35.24(b), identifies that the RSO, with written agreement of the licensee's management, must assign the specific duties and tasks to the Associate RSO. These duties and tasks are restricted to the types of use for which the Associate RSO is listed on a license. The RSO may delegate duties and tasks to the Associate RSO but shall not delegate the authority or responsibilities for implementing the radiation protection program. The attached, "Model Appointment of ARSO," from NUREG-1556, Volume 9, Rev. 3, Appendix I, may be used to support the appointment of the Associate RSO. No response to this item is required.

6. Your request was not signed by a management representative as required. As identified in Section 8.13, "Item 13: Certification," of NUREG-1556, Volume 9, Rev. 3, requests must be signed by a representative authorized to make binding commitments and to sign official documents on behalf of the licensee (i.e., a certifying official). Therefore, please revise and resubmit the amendment bearing the signature of a management representative. For additional information, you may refer to Chapter 3, "Management Responsibility," of the guidance.

Please respond to this request within 15 calendar days and include a reference to your U.S. NRC Materials Number No. 24-00866-02 and Control No. 643960 in your signed response letter. As you will not receive a hardcopy of this request, please confirm that you have received this e-mail request for additional or clarifying information.

Lastly, I recognize that the Christmas and New Years Holidays are upon us. Therefore, please do let me know if you should need additional time to respond to the items in my request. I may be reached at (630) 829-9737 or via e-mail at [Jason.Kelly@nrc.gov](mailto:Jason.Kelly@nrc.gov).

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**Model Appointment of ARSO**

Memo To: Associate Radiation Safety Officer

From: Chief Executive Officer  
Radiation Safety Officer

Subject: Appointment of ARSO

You, \_\_\_\_\_, have been appointed an Associate Radiation Safety Officer. The Radiation Safety Officer, with written agreement from management, will assign specific oversight duties and tasks to you. These duties and tasks are restricted to the types of use for which you are listed on our license.

You are free to raise issues with the Nuclear Regulatory Commission at any time. It is estimated that you will spend \_\_\_\_\_ hours per week conducting Associate Radiation Safety Officer duties and tasks.

You will report to the Radiation Safety Officer, who retains responsibility for oversight of the entire radiation safety program.

\_\_\_\_\_  
Signature of Management Representative

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Radiation Safety Officer

\_\_\_\_\_  
Date

cc: Names of affected department heads