

**From:** [Powell, Rhonda](#)  
**To:** [Tony Gonzalez](#)  
**Subject:** [External\_Sender] RE: Radioactive Materials License Renewal Application  
**Date:** Thursday, December 12, 2024 4:57:41 PM  
**Attachments:** Renewal 8-11.docx

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Please find attached. Thank you for your help. Please let me know if you need anything else.

Rhonda

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**From:** Tony Gonzalez <Antonio.Gonzalez@nrc.gov>  
**Sent:** Wednesday, December 11, 2024 9:12 AM  
**To:** Powell, Rhonda <RSPowell@kh.org>  
**Subject:** Radioactive Materials License Renewal Application

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Good morning Rhonda,

I am reviewing your request for renewal of the Bonner General Health radioactive materials license. However it appears you may have used outdated guidance in your responses. Current guidance for medical licenses is [NUREG 1556 Vol. 9 Rev. 3](#). Please review the attached and provided responses within 15 days indicating your commitments. If you have any questions I can be reached at 817-200-1472.

Best Regards,

**Antonio J. Gonzalez, Health Physicist**  
U.S. Nuclear Regulatory Commission, Region IV  
Division of Radiological Safety & Security  
Materials Licensing Branch  
P: 817-200-1472  
E: [Antonio.Gonzalez@nrc.gov](mailto:Antonio.Gonzalez@nrc.gov)



## Renewal NRC form 313 License #11-27785-01

### Item 8 (revised)

We have 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.

### Item 9 (revised)

#### **Radiation Monitoring Instruments:**

Radiation monitoring instruments will be calibrated by a vendor who is licensed by the NRC or an Agreement State to perform instrument calibrations.

We have developed and will implement and maintain written radiation survey meter calibration procedures in accordance with the requirements in 10 CFR 20.1501 and that meet the requirements of 10 CFR 35.61

#### **Dose Calibrator and Other Dosage Measuring Equipment:**

Equipment used to measure dosages will be calibrated in accordance with nationally recognized standards or the manufacturer's instructions.

### Item 10 (revised)

#### **Occupational Dose**

We will monitor individuals in accordance with the criteria in the section titled, 'Radiation Safety Program—Occupational Dose' in NUREG–1556, Vol. 9, Rev. 3, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Medical Use Licensees.

#### **Spill/Contamination Procedures**

We have developed and will implement and maintain written procedures for safe response to spills of licensed material in accordance with 10 CFR 20.1101.



## Renewal NRC form 313 License #11-27785-01 Item 10 (revised)

### **Material Receipt and Accountability**

We will develop, implement, and maintain written procedures for licensed material accountability and control to ensure that:

license possession limits are not exceeded

licensed material in storage is secured from unauthorized access or removal

licensed material not in storage is maintained under constant surveillance and control

records of receipt (either from the licensee's own production operations or from another licensee), transfer, and disposal of licensed material, are maintained.

We will comply with the National Source Tracking System (NSTS) reporting requirement, as described in 10 CFR 20.2207

### **Leak Tests**

Leak test sample collection and analysis will be performed by an organization authorized by the NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits or sample analysis services to other licensees and according to the instructions provided in the leak test sample collection kit.

### **Area Surveys**

We have developed and will implement and maintain written procedures for area surveys in accordance with 10 CFR 20.1101 that meet the requirements of 10 CFR 20.1501 and 10 CFR 35.70

### **Safe Use of Unsealed Licensed Material**

We have developed and will implement and maintain written procedures for safe use of unsealed byproduct material that meet the requirements of 10 CFR 20.1101 and 10 CFR 20.1201

## Item 11(revised)

We have developed and will implement and maintain written waste disposal procedures for licensed material in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of 10 CFR Part 20, Subpart K, and of 10 CFR 35.92.

Contact the appropriate NRC Regional Office for guidance on treatment or disposal of waste by incineration or compaction