



CAGUAS
Consolidated Medical Plaza
Suite 101
201 Ave. Gautier Benítez

GUAYAMA
La Fuente Town Center
706 Calle Marginal

HUMACAO
18 Ave. Font Martelo
Esquina Recreo

AIBONITO
120 Calle José C. Vázquez
frente al Hospital Menonita

Date : April 16, 2025

From : Hiram Rivera Luna, M.D.
Director and RSO
Nuscan CSP
hrivera@nuscan.com
PO Box 6960
Caguas PR, 00726-6960

To : Kelli Trotter, Health Physicist
Medical and Licensing Assistance Branch
Division of Radiological Safety and Security
United States Nuclear Regulatory Commission
Region I

SUBJECT : NUSCAN CSP, REQUEST FOR ADDITIONAL INFORMATION,
MAIL CONTROL NO. 645783
License No. 52-17273-01
Docket No. 030-12483
Mail Control No. 645783

Dear Kelli Trotter:

To address your questions in a letter dated April 14, 2025 regarding our letter dated March 14, 2025, notifying the NRC about change of equipment for NRC License No. 52-17273-01.

1. Regarding the new Philips Ingenuity TF 128 PET/CT system, please provide the following information:

- a. Is the new camera in a different room or position from the old camera that would require changes to the shielding evaluations currently on file with the NRC?

Answer: We certify that the new Philips Ingenuity TF 128 PET/CT system is exactly in the same room and in the same position as the previous Philips Gemini 16 PET/CT system.



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- b. Is there a radioactive source inside of the PET/CT camera, and if so, does that source fall within the provisions of 10 CFR 35.65?

Answer: No, there is no radioactive source inside of the Philips Ingenuity TF 128 PET/CT camera.

2. Please confirm if the previous workload assumptions submitted January 4, 2024, are the same (i.e., 15 patients per week with a maximum F-18 dose of 15 mCi). If these have changed, please provide the updated shielding calculations with these new workloads to demonstrate if new shielding installation is required.

Answer: We confirm the same workload of 15 patients per week with a maximum F-18 dose of 15 mCi).

In fact, we were performing no more than 12 patients per week with the previous system and will perform no more than 15 patients per week with the new system because of limitations with personnel and problems with timing and logistic with the only radiopharmacy providing the F-18 in Puerto Rico. If, in the future, those limitations and logistic problems resolve such that the workload could be increased, we will perform new shielding calculations and install new shielding as needed and notify NRC immediately.