



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION III  
2056 WESTINGS AVENUE, SUITE 400  
NAPERVILLE, IL 60563-2657

June 16, 2025

Kerry Krugh, Ph.D., DABR  
Radiation Safety Officer  
ProMedica Charles & Virginia Hickman Hospital  
Department of Radiology  
5640 N Adrian Hwy.  
Adrian, MI 49221

Dear Dr. Krugh:

This letter is regarding the request dated February 14, 2025, signed by Bryan Ward, President, for the renewal of U.S. Nuclear Regulatory Commission (NRC) Materials License No. 21-03194-01.

The U.S. NRC's guidance document for your type of license, which I refer to below as "the guidance," is NUREG-1556, Volume 9, Rev. 3, dated September 2019, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Medical Use Licenses." This guidance is available on the U.S. NRC website at:  
<https://www.nrc.gov/docs/ML1925/ML19256C219.pdf>

Upon review of the request, I identified the following areas requiring additional or clarifying information:

1. Section 8.2, "Item 2: Name and Mailing Address of Applicant," of the guidance, specifies that the legal name of the applicant's corporation or other legal entity be identified in the license application.

Your application identifies your company's legal name as *PROMEDICA CHARLES & VIRGINIA HICKMAN HOSPITAL*. An inquiry with the Michigan Department of Licensing and Regulatory Affairs was unable to verify the active registration of your company's legal name; however, an active registration was located for *EMMA L. BIXBY MEDICAL CENTER, d/b/a Promedica Charles and Virginia Hickman Hospital*.

Please confirm that your company's complete legal name is *EMMA L. BIXBY MEDICAL CENTER, d/b/a Promedica Charles and Virginia Hickman Hospital*. Otherwise, provide the complete legal name under which your company is actively registered.

2. Section 8.9.1, "Facility Diagrams," of the guidance, specifies that a description of the Positron Emission Tomography (PET) facility should include:
  - facility diagram (including the scale and the direction of north);
  - types and thicknesses of shielding installed and shielding evaluation;
  - specialized handling equipment; and
  - survey results to ensure to ensure the regulatory limits in 10 CFR §20.1201, "Occupational dose limits for adults," and 10 CFR §20.1301, "Dose limits for individual members of the public," are not exceeded.

It is unclear if you are or will be using PET radionuclides for diagnostic studies. If applicable, please address the above information in your response. Otherwise, please confirm that you will not be using PET radionuclides under the license.

3. Section 8.9.2., "Radiation Monitoring Instruments," of the guidance, identifies that your application must describe the radiation detection instruments available for measuring radiation levels, radioactive contamination, and radioactivity, as applicable.

Your application identified that you currently possess the following radiation detection instruments:

- Capintec CRC-25W Dose Calibrator;
- Capintec Captus 4000e Well Counter; and
- Ludlum 3 and 14C Survey Meters

Your Ludlum Model 3 and 14C survey meters should be equipped with an external probe for measuring the typical radiation levels in your facility and for detecting and assessing radioactivity and radioactive contamination at your facility.

Please identify the compatible external probes used with your Ludlum Model 3 and 14C survey meters.

In accordance with [10 CFR §2.390](#) of the NRC's "Rules of Practice," a copy of this letter and its enclosure 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>.

To continue review of your request, please submit your response to this letter within 20 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. I will assume that you do not wish to further pursue this licensing action if I do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, I encourage you to contact me at (630) 829-9737 or via e-mail at [Jason.Kelly@nrc.gov](mailto:Jason.Kelly@nrc.gov).

Sincerely,

Jason M. Kelly, MPH, CPH  
Health Physicist  
Materials Licensing Branch

Control No.: 645265  
Docket No.: 030-02027  
License No.: 21-03194-01