Cardinal Health Nuclear & Precision Health Solutions 7000 Cardinal Place Dublin, OH 43017 tel 614.757.5000



July 29, 2025

Radioactive Materials Licensing
Division of Radiological Safety and Security (DRSS)
Medical and Licensing Assistance Branch (MLAB)
U.S. Nuclear Regulatory Commission Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406

Additional Information for Amendment Request for Cardinal Health P.R. 120, Inc., Radioactive Materials License No. 34-31473-02MD, Guaynabo, Puerto Rico, Mail Control No. 647263

Mr. VonEhr,

Cardinal Health submits the additional information as requested in the letter dated July 14, 2025 to add Olga Gonzalez, R.Ph. as an Authorized Nuclear Pharmacist in Condition 11.B. of the Radioactive Materials License.

An updated copy of the Radioisotope Handling Experience log is attached. The log initially did not include use item "1" which includes ordering, shipping, receiving radioactive materials and performing related radiation surveys. This use item was previously omitted because Ms. Gonzalez did not have experience ordering radioisotopes as this task is normally delegated to Nuclear Pharmacy Technicians. Training and Experience was received for shipping and receiving radioactive materials and performing related radiation surveys. Ms. Gonzalez has now also been adequately trained on the radioisotope ordering process and is familiar with the process to perform independently moving forward.

If you have any additional questions, please contact me at 765.702.1000 or cami.still@cardinalhealth.com

Sincerely,

Cami Still

Director, Health Physics

Nuclear & Precision Health Solutions

## RADIOISOTOPE HANDLING EXPERIENCE

Name: Olga V. Gonzalez Cruz Date: July 24, 2025

Document the actual use/handling of radioactive material under the supervision of an Authorized Nuclear Pharmacist.

ISOTOPE	SINGLE HIGHEST mCi ACTIVITY HANDLED	USE See key below: 1,2,3,4,5,6,7	EXPERIENCE Actual clock hours (Include date range of experience)	WHERE EXPERIENCE GAINED
Co-57	5	1, 2	Jan 20,2025 to June 9, 2025	Cardinal Health
Cs-137	0.2	1, 2	800 hours	
F-18	0			
Ga-67	180	1,2,3,4,5,6		
I-123	10	1, 2, 3,4,5,6		
I-131	500	1, 2, 3,4,5,6		
In-111	1.2	1, 2, 3,4,5,6		
Mo-99	19000	1, 7		
Tc-99m	10000	1, 2, 3,4,5,6,7		
TI-201	0			
Xe-133	0			
Y-90	0			

Key for "Use": the number, or numbers, entered under "Use" should correspond to the handling experience for each isotope.

- 1. Ordering, shipping, receiving radioactive materials and performing related radiation surveys
- Calibrating, using and performing checks for proper operation of dose calibrators, scintillation detectors, survey meters, and, if appropriate, instruments used to measure alpha- or beta-emitting radionuclides
- 3. Calculating, assaying and safely preparing dosages for patients or human research subjects
- 4. Using appropriate internal controls to avoid mistakes in the labeling and/or administration of by product material
- 5. Using procedures to prevent or minimize contamination and using proper decontamination procedures
- 6. Learning emergency procedures to handle and contain spilled materials safely, including related decontamination procedures, surveys, and wipe tests
- 7. Eluting Tc-99m from generator systems, assaying the eluate for Tc-99m and for Mo-99 contaminations, and processing the eluate with reagent kits to prepare Tc-99m labeled radioactive drugs