



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
475 ALLENDALE ROAD – SUITE 102
KING OF PRUSSIA, PA 19406-1415

August 6, 2025

Tammy P. Sadek, DVM
Radiation Safety Officer
RB Cats Limited VH, LLC
1260 New Britain Avenue
West Hartford, CT 06110

**SUBJECT: RB CATS LIMITED VH, LLC, REQUEST FOR ADDITIONAL INFORMATION,
MAIL CONTROL NO. 647477**

Dear Dr. Sadek:

This letter is regarding the application dated June 24, 2025, signed by Erika Svendsen, General Manager, GP Operations, for issuance of a U.S. Nuclear Regulatory Commission (NRC) Materials License.

In order to continue our review, we need the following additional information. Please note that the specific requests and suggested format for responses to these items may be found in Appendices B and D to NUREG-1556, Volume 7, Rev. 1, dated February 2018, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope." This guidance is available on the U.S. NRC website at: <https://www.nrc.gov/docs/ML1806/ML18065A006.pdf>

1. Item 8.2 - Name and Mailing Address of Applicant:

- a. On the submitted NRC Form 313, the applicant's name reads as RB Cats Limited VH, LLC. On the following page, the applicant's name is listed as RB Cats Limited VH. Please indicate which name is correct.
- b. It is noted that RB Cats Limited VH has a mailing address and location of use address in Connecticut, the billing address is in Maine, and the Radiation Safety Officer is located in Michigan. Please explain the relationship between RB Cats Limited VH, Cats Limited Veterinary Hospital, Cat Hyperthyroid Radioactive Iodine Services LLC, and Rare Breed Cats Limited Veterinary Hospital. In addition, please confirm that RB Cats Limited VH is the legal entity with direct control over use of the radioactive material.
- c. The application was signed by Erika Svendsen, General Manager, GP Operations. Pursuant to 10 CFR 30.32(c), each application must be signed by the applicant or licensee or a person duly authorized to act for and on behalf of the applicant or licensee. Please have a senior management representative (e.g., President, owner, etc.) for RB Cats Limited VH confirm that Erika Svendsen is duly authorized to act for and make legally binding commitments on behalf of RB Cats Limited VH. If Erika Svendsen is not authorized to make these commitments, please have the senior management representative confirm that they have reviewed the application dated June 24, 2025, and they abide by all statements and commitments made in that application.

2. Item 8.7.1 - Radiation Safety Officer (RSO):

- a. The RSO Delegation of Authority (DOA) letter provided in your application does not provide all expected information. It does not allow the RSO to raise issues with the U.S. Nuclear Regulatory Commission at any time and does not specify the estimated time that the RSO will spend conducting radiation protection activities. In addition, the management signature was a font signature, and not an actual signature. Please resubmit the RSO DOA and address this information. A model RSO DOA can be found in Appendix E of the referenced NUREG.
- b. Since the RSO is a consultant-RSO, please provide the following information:
 - Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of RSO as described in the regulations. State the consultant-RSO's minimum amount of onsite time (hours per week or days per quarter, as appropriate for the program).
 - Identify an in-house representative who will serve as the point of contact during the RSO's absence.
 - Describe the overall availability of the consultant-RSO to respond to questions about operational issues that arise during the conduct of the radiation safety program and related regulatory requirements.
 - Specify the maximum amount of time it will take the consultant-RSO to arrive at the facility in the event of an emergency that requires his/her presence.

3. Item 8.7.2 - Authorized User:

Since the authorized user (AU) is an AU on multiple NRC and Agreement State licenses, please indicate how often the AU will be onsite at the RB Cat Limited Veterinary Hospital.

4. Item 8.9 - Facilities and Equipment:

- a. Please include a description of the areas used for the receipt of radioactive materials.
- b. The application indicated that RB Cats will purchase two Ludlum 14C or Model 3 Geiger counters with Model 44-2 (sodium iodide) or Model 44-9 (pancake) probes or equivalent such as Model 26-1 Pancake Frisker digital radiation meter.

Please indicate what instruments will be purchased. The instruments should be carefully selected (considering efficiency and energy response) to make sure it is appropriate for all intended uses. For example, while a pancake probe is appropriate for package surveys, a sodium iodide probe would be more suitable for detecting I-131 and for conducting bioassays (if calibrated for this purpose). The Model 26-1 can be used to measure dose rate but can significantly overrespond to gamma energies so a filter may need to be purchased that flattens the detector's energy response (or an appropriate conversion factor for the instrument should be used). An ion chamber for dose rate may also be appropriate.

- c. Please confirm that the space will be built in accordance with the shielding recommendations in letter dated June 3, 2025 (pages 68-75 of your application).
- d. Please confirm that the I-131 room will be locked when radioactive material and/or radioactive cats are housed in the room (and trained staff are not within the room) and that the waste storage room will be locked when waste is present.

5. Item 8.10.7 - Surveys and Leak Tests:

Please provide the following commitment: "We will survey our facility and maintain contamination levels in accordance with the survey frequencies and contamination levels published in Appendix M in NUREG-1556, Volume 7, Revision 1, 'Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope.'"

6. Item 11 – Waste

On page 11 of your application, you confirmed the following statement, "We will use the model waste procedures in Appendix P in NUREG-1556, Volume 7, Revision 1, 'Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope.'" However, on page 20 of your application, you checked, "We will use the [specify either (i) decay-in-storage or (ii) disposal of liquids into sanitary sewerage] model waste procedures that are published in Appendix P in NUREG-1556, Volume 7, Revision 1, with neither specified. Please confirm which waste procedures you will be using.

7. Appendix D, Guidance for Laboratory Animal and Veterinary Medicine Uses:

- a. The licensee must ensure that the dose from a cat treated with I-131 to individual members of the public (e.g., the cat owner) does not exceed the 0.02 mSv [0.002 rem or 2 mrem] in any one hour, and 1 mSv [0.1 rem or 100 mrem] annual public dose limit specified in 10 CFR 20.1301.

On page 119 of your application, it indicates that if there are no pregnant women or children under 18 years of age in the home, the cat can be released from quarantine 7 days after release and that co-sleeping with the cat can resume. Using the table you provided on pg. 114 of your license application, the dose rate 9 days after injection (which would be 7 days after release), at 6 inches from the cat, would be approximately 4.33 mR/hr. This is utilizing a 2.5 mCi dose, but you would be authorized for up to 7.0 mCi.

Please provide further justification on how owners will meet the dose to the public limits or update your patient release instructions to restrict co-sleeping (and any other close contact activities) with the cat for 14 days.

- b. On page 55 of the application (page 14 of the training), it indicates that if the cat dies at home after discharge, then there are no restrictions. On page 94 of the application, it indicates that if the patient passes during treatment or quarantine, they need to be logged into the waste disposal log and held in the freezer in the I-131 room for 81 days until reaching background measurements. Please confirm that if a cat passes away during quarantine, the cat will be transported back to

the veterinary office for decay-in-storage and that the training on page 55 will be revised to reflect this.

- c. On pages 117-118 of your application, you provided calculations using an activity of 2.5 mCi. Please provide the calculations for maximum administered activity of 7.0 mCi.
- d. In the event that there is a breach in the encapsulation of an I-131 capsule or an unusual event that could lead to the release of I-131 (e.g., a spill or damaged capsule), please confirm that a bioassay would be performed.
- e. On pages 61 and 86 of your application, it gives trigger levels in DPI. Please confirm that this is meant to be DPM. On page 86, please confirm that wipes are done in CPM (not CFM) and will be converted into DPM.
- f. Pages 79 and 113 of your application reference Riverside Cat Hospital.
- g. While you were not required to provide a copy of the PowerPoint presentation you use for radiation safety training, you included the training used for clerical and non-clerical staff. However, some of the presentation slides were not legible.
 - Please confirm that classroom training will cover the following areas:
Principles and practices of radiation protection; radioactivity measurements, monitoring techniques, and using instruments; mathematics and calculations basic to using and measuring radioactivity; and biological effects of radiation
 - Please confirm that on-the-job training will include:
Observing authorized personnel perform licensed activities with animals, including administration of the radioactive material to the animal, using survey equipment, proper contamination control techniques, and proper methods for disposal of radioactive material; performing licensed activities with animals (e.g., administration of radioactive material to an animal, use of survey equipment, proper contamination control techniques, and proper disposal of radioactive material) under the supervision of, and in the physical presence of, an individual authorized to handle animals treated with licensed material or otherwise containing licensed material; and training that is specific to the radionuclides (types, forms and quantities; radiations emitted; chemical composition) used under the license, the procedures that will be performed, the animals used, and the surveys and contamination control activities necessary for the materials used and procedures performed.

We will continue our review upon receipt of this information. Please reply to my attention at:

Janice Nguyen
Mail Control No. 647477
USNRC, Region I
Division of Radiological Safety and Security
475 Allendale Road – Suite 102
King of Prussia, PA 19406

Or

R1DRSSMail.Resource@nrc.gov
Reference – Janice Nguyen
Mail Control No. 647477

In order to continue prompt review of your application, we request that you submit your response to this letter by August 26, 2025.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at (610) 337-5006 or via electronic mail at janice.nguyen@nrc.gov, or Brian Nepper at (610) 337-5197 or via electronic mail at brian.nepper@nrc.gov.

Thank you for your cooperation.

Sincerely,

Janice Nguyen, Senior Health Physicist
Medical and Licensing Assistance Branch
Division of Radiological Safety and Security
Region I

License No. 06-35796-01
Docket No. 030-39424
Mail Control No. 647477

cc: Erika Svendsen, General Manager, GP Operations

RB CATS LIMITED VH, LLC, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 647477 DATED AUGUST 6, 2025

SUNSI Review Complete: BNepper

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