From: Nathan Bryant
To: lsphysics@att.net
Subject: CN 647091 Request for Additional Information
Date: Wednesday, September 3, 2025 11:48:00 AM
Attachments: Model Delegation of Authority.pdf

Good morning, Ms. Smith,

This email is in response to the application dated May 19, 2025, to renew U.S. Nuclear Regulatory Commission (NRC) Materials License No. 21-15638-01. Upon reviewing your request, the following areas were identified and require additional information:

1. NUREG 1556 Vol 9, Rev. 3 Section 3.1 “Commitments and Responsibilities,” and 10 CFR 35.12 (a), identifies that a management representative (i.e., chief executive officer or delegate) must sign the submitted application. In your application, it is unclear whether Rachel Friedsberg, Radiology Administration, has the authority to act on behalf of the licensee.

   Please confirm with a senior management representative, by signed response, that Rachel Friedsberg is duly authorized to act for and on behalf of the licensee or provide a senior management signed cover letter co-signing the contents of this application.

2. NRC no longer recognizes ABR certifications satisfying 10 CFR 35.50 requirements as of December 31, 2023. ABR certifications acquired before this date are still accepted and recognized.

   The Medical Uses Licensees Toolkit web page provides NRC Form 313A (RSO) to be used to document training and experience. Please provide a completed NRC Form 313A (RSO) with Preceptor Attestation or provide an NRC or Agreement State license listing the proposed RSO overseeing all current authorized uses on your license. Documentation must meet 10 CFR 35.59 “Recentness of Training” requirement which states training must be obtained within 7 years preceding the date of the application.

3. NUREG 1556 Vol. 9, Rev. 3 Section 8.7.1, “Radiation Safety Officer,” identifies that the Radiation Safety Officer (RSO) is responsible for the radiation protection program, consistent with 10 CFR 35.24. The RSO must have sufficient organizational authority and management prerogative to perform his or her duties.

   Please submit a delegation of authority supporting the appointment as RSO. Appendix I, “Radiation Safety Officer Duties, Responsibilities, and Delegation,” of the guidance, includes an example delegation of authority on page I-4. Note that the delegation of authority should be signed by the proposed RSO and a management representative. Include the printed name, title, and date for each individual signing.

4. The Associate Radiation Safety Officer, Louisa Ritchlin, was not mentioned in the renewal package. Do you wish to keep the current ARSO on the license or remove them?

5. Please provide the contact information for both the proposed RSO and proposed ARSO, including the following as applicable:

    - office phone number
    - mobile phone number
    - fax number
    - e-mail address

Please submit your signed response letter by October 3, 2025. If you need more time or have any questions, please don't hesitate to contact me. As you will not receive a hard copy of this request for additional information, please confirm that you have received this email.

Thank you,

Nathan Bryant
Health Physicist
Materials Licensing Branch
U.S. Nuclear Regulatory Commission
Region III
Office: 630-829-9861

U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Model Delegation of Authority

Memo To: (Name of Radiation Safety Officer)
From: (Name of Chief Executive Officer or other ranking official)
Subject: Delegation of Authority

You, _____, have been appointed Radiation Safety Officer and are responsible for ensuring the safe and secure use of radiation and radioactive material. You are responsible for managing the radiation protection program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations when justified to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the U.S. Nuclear Regulatory Commission at any time. It is estimated that you will spend _____ hours per week conducting radiation protection activities.

_____ _____
Signature of Management Representative Date

I accept the above responsibilities,

_____ _____
Signature of Radiation Safety Officer Date

cc: Names of affected department heads

Martha Pavon

From: Nathan Bryant
Sent: Wednesday, December 10, 2025 9:31 AM
To: Martha Pavon
Cc: Sandy Pavon; Tammy Tomczak
Subject: CN 647091 Request for Additional Information and Repsonse
Attachments: Form 665- CN 647091 Request for Addition Information.pdf; CN 647091 Request for Additional Information.pdf; Form 665- CN 647091 Response to Request for Additional Information.pdf; CN 647091 Response to Request for Additional Information.pdf

Good morning, Martha,

Please add to ADAMS.

Thank you,

Nathan Bryant
Health Physicist
Materials Licensing Branch
U.S. Nuclear Regulatory Commission
Region III
Office: 630-829-9861