

From: [Jason VonEhr](#)
To: ["Al-Samaraee, Auroba"](#)
Cc: [Rammo, Fadi](#); [Damkevala, Zal R](#); [Lowitz, Sarah](#); [Isack, Asisa](#); [Frame, Cara M](#); [Pang, Dalong](#); [Niu, Ying](#)
Subject: RE: MGUH new HDR Amendment
Date: Wednesday, January 14, 2026 10:36:00 AM
Attachments: image002.jpg

Auroba Al-Samaraee, M.Sc, CPHQ:

Received; Thank you for reaching out and thank you for your patience – the NRC in general and my group in particular has been short staffed and my ability to work overtime has been significantly curtailed despite the workload.

I have had a chance to review the submission as it stands and there are some items that will require redress.

From the (undated) letter with supporting information received on December 17 and 18, 2025:

- The supporting infrastructure (your letter's item 3.C) referenced the Flexitron User Manual. As I discussed in my email to you on December 18, 2025, I will need the *actual* facility supporting infrastructure description, not the 'suggested' or 'template' recommended by the manufacturer. This supports the NRC's determination of adequacy of your facility. As this was not addressed in your existing license during your last renewal, I am attempting to fill the gap with this amendment.
 - Response: Consistent with NUREG-1556, Volume 9, Revision 3 (and consistent with Volume 11's treatment of 'special uses' representing higher risk activities), this infrastructure description must include: Warning systems and restricted area controls; area radiation monitoring equipment; viewing and intercom systems; electrical interlocks to prevent dual operation of radiation producing devices (e.g., a co-housed linear accelerator); description of key control; and emergency response equipment.

From your supplemental submission via email on January 7, 2026:

- Regarding your spot check procedures: In my review of your submitted procedures against 10 CFR 35.643, there were a few deficiencies that must be addressed and a revised procedure produced.
 - 10 CFR 35.643(d)(2), regarding source exposure indicator lights on the (1) HDR unit; (2) control console; and (3) the facility, did not appear to have checks under Section 4 of your procedure. The "console display and indicator lights" in the Daily Warmup LOG suggests these steps are part of the procedure, but without the corresponding check in Section 4.
 - 10 CFR 35.643(d)(5), regarding the radiation monitors used to indicate the source position, the procedure must address your hand-held survey meter and the prime alert functionality. While Section 4.4 directs staff to take a *background* reading, I expect any user of a survey meter to check that the meter *responds to radiation* – your Daily Warmup LOG suggests the use of a

check source to accomplish this, but Section 4.4 is absent this description.

There is not check described for the prime alert – this is typically accomplished during other parts of the procedure when the HDR source is exposed for other purposes. Section 4.3 only directs staff to check for a indicator light regarding the system's power supply.

- 10 CFR 35.643(d)(7), regarding the clock (date and time) in the unit computer – this appears to be incorporated into Section 4.6 of your procedure as part of the decayed activity check (under 10 CFR 35.643(d)(8)), however there is no success criteria (as a quantitative step – staff need to know what constitutes success and what would constitute a failure) for the staff to compare to, despite a warning in the procedure check about a difference between the treatment console date and time and the computer operating system date and time.
- *Overall*: please revise your spot check in response to the above.
- Regarding emergency procedures: Part of your December 17/18, 2025, submission was the “long-form” emergency procedures. I was not expecting a new set of emergency procedures from you, as that in-house procedure would potentially clash in their detail/implementation with the vendor's procedure.
 - Option 1: Withdraw your procedures and commit to using the Elekta Section 8 emergency procedures (already part of the December 17/18 submission).
 - Option 2: Withdraw the Elekta Section 8 emergency procedures and commit to using your own in-house procedure. Some of my observations from your emergency procedures are as follows, and should result in revision and resubmission of your emergency procedure:
 - Section 4 begins using an acronym (“TCC” treatment communication console) without having been introduced – generally not a good idea with procedures to toss around acronyms without introduction.
 - Section 4.b does not mention the use of extremity dosimetry – recall this is an item I discussed with you earlier and was part of your response to my initial list of requests (see your letter item 3.D)
 - Section 4.b requires the securing of the room and contact with Elekta if radiation remains above background. There is no mention of what to do with the *patient* in this scenario, nor can I infer that you have evacuated the patient when I continue reading on with Section 4.c.
 - Section 4.d regarding power failures directs the user to ‘check’ whether the source was retracted. In an emergency I would expect the procedure to explicitly call for a *radiation* check (using both the prime alert and hand-held survey meter) rather than rely on the console, as one could infer would be acceptable from this step.
 - Section 4.e regarding a medical crisis directs staff to only enter the room once radiation is confirmed safe. It is my expectation that a life-threatening emergency on the part of the patient is more important than

the occupational exposure to radiation, and therefore this sub-step (4.e.3) appears to be to the detriment of the patient and potentially life-threatening.

It would be best for the clarity of your license, as the documents supporting this amendment will be tied to your license under License Condition 22, if you take the merged document I provided you on December 18, 2025 (which cut out large chunks of documentation that did not provide value-added support to your amendment), revise it in response to the above items, re-sign (and date) and re-submit it. I will attempt to call you again this morning, as I was only able to leave a voicemail earlier this morning, to go over these items with you. While I know you are trying to complete this action as soon as possible, **I would request the response to these items within the next 15 days (on or before January 29, 2026).**

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this email 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>.

Thank you,

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