



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

January 22, 2026

COL Ricardo Reyes, Ph.D.,
Radiation Safety Officer
Defense Health Agency
7700 Arlington Boulevard, Suite #5101
Falls Church, VA 22042-5101

SUBJECT: DEFENSE HEALTH AGENCY, REQUEST FOR ADDITIONAL INFORMATION,
MAIL CONTROL NO. 655071

Dear COL Reyes:

This is in reference to your letter dated December 30, 2025, requesting to amend NRC License No. 45-35423-01. In order to continue our review, we need the following additional information:

1. Regarding your requests to add Jason A. Fewkes as an Associate Radiation Safety Officers (ARSO) – the attestations by Thomas M. Valentine and MAJ Jasen Swanson only quoted yttrium-90 SIR-Spheres. Please note that, consistent with the NRC's licensing guidance for yttrium-90 microspheres (Revision 10.2, dated April 20, 2021), under Section 5.2, does not require training to be specific to the type of microsphere (either SIR-Spheres or TheraSpheres). No response is required for this item.
2. Regarding your request to add CDR Brandon J. Russell as an ARSO – your enclosure appears to include supporting documentation for multiple approval pathways. It is recommended that a simpler approach be pursued with future amendment requests – for example the initial approach was the Form 313A utilizing the board certification pathway. In this pathway, a copy of the board certification is required (not the letters), but was not provided in your submission. Alternatively, you've submitted information supporting approval under a structured education program, including training at the Naval Undersea Medical Institute and Uniformed Services University of Health Sciences, as well as continuing education to address the greater-than-seven-years under 10 CFR 35.59. Finally, you also included documentation supporting approval as a prior RSO for an equivalent authorization under the Navy Master Materials License Permit for the Naval Medical Center in San Diego, California, prior to this facility's incorporation into DHA. While a complete approval was able to be achieved, the volume of information (63 pages in total) complicated and slowed down the NRC's review of CDR Russel's qualification. No response is required for this item.

3. Regarding your request for the NRC to remove Building E2100, a location authorized as part of the Defense Center for Public Health – Aberdeen, from your NRC license, and thus release the facility for unrestricted use, and pursuant to a teleconference held on January 21, 2026, with you and other DHA representatives, please revise and resubmit your decommissioning report (Enclosure 1 of your submission dated December 30, 2025) to address the following:
 - a. Your historical site assessment does not appear to include, describe, or otherwise address the significant variety of radioactive materials that were possessed and used at this facility, as identified by the NRC during the review of our historical records as well as described by DHA representatives during the teleconference on January 21, 2026. Please provide: (1) an expanded description of radioactive materials, including, in general, their quantities and forms; and (2) a justification for limiting your radiological assessment to hydrogen-3, carbon-14, and nickel-63, as described in Section 4 of your submission.
 - b. During the teleconference on January 21, 2026, the NRC and DHA representatives discussed the matter of known spills or instances where it is known that contamination occurred during the facility's history. Please provide an expanded description of DHA's understanding of and confidence in the assertions that spills, while known to have occurred, were (1) small in scope and impact; (2) identified contemporarily; (3) mitigated and addressed contemporarily; and (4) were cleared contemporarily and thus did not represent an ongoing concern for residual radioactive material.
 - c. During the teleconference on January 21, 2026, the NRC and DHA representatives discussed the matter of inaccessible or difficult-to-access areas where radioactive material may accumulate, such as fume hoods, ventilation ducts, and plumbing (associated with disposals via sanitary sewer(s)). In addition, there was discussion of areas where radioactive material may have 'trafficked' between laboratories, such as in hallways and corridors. Please provide an expanded description of your assessment of these areas of your facility in terms of your historical review and performance of surveys, as applicable, that provide high confidence in the absence of residual radioactive material.
 - d. During the teleconference on January 21, 2026, the NRC and DHA representatives discussed the matter of waste management. During that call DHA representatives described that waste from Building E2100 was accumulated, managed, and disposed of from a facility outside of Building E2100. Please include a statement addressing this in your report.
 - e. During the teleconference on January 21, 2026, the NRC and DHA representatives discussed the matter of significant building renovations, such that floor plans, room identification, or other matters may have occurred that complicate the review of the historical record or change the nature and scope of your survey efforts. During that call DHA representatives described that no renovations of the building had occurred in any significant fashion since it's the beginning of the use of radioactive materials. Please include a description addressing this in your report.

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

R1DRSSMail.Resource@nrc.gov

cc: Jason.vonEhr@nrc.gov

*Reference – Jason vonEhr
Mail Control No. 655071*

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding medical uses of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/med-use-toolkit.html>. This site also provides the updated Training and Experience NRC Form 313A series of forms and guidance, as well as 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 "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 the 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 the 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) 337-5256 or via electronic mail at Jason.vonEhr@nrc.gov.

Thank you for your cooperation.

Sincerely,

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

License No. 45-35423-01
Docket No. 030-39046
Mail Control No. 655071

SUBJECT: DEFENSE HEALTH AGENCY, REQUEST FOR ADDITIONAL INFORMATION,
MAIL CONTROL NO. 655071 DATED JANUARY 22, 2026

SUNSI Review Complete: JEV

After declaring this document "An Official Agency Record" it **will** be released to the Public.

OFFICE	RI:DRSS	RI:DRSS		
NAME	KBarnes	JvonEhr		
DATE	01/22/2026	01/22/2026		

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