



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2056 WESTINGS AVENUE, SUITE 400
NAPERVILLE, IL 60563-2657

January 30, 2026

Evan T. Western, CHP
Manager, Health Physics
Cardinal Health 414, LLC
7000 Cardinal Pl.
Dublin, OH 43017

SUBJECT: AMENDMENT NO. 9 TO RADIOACTIVE MATERIALS LICENSE FOR CARDINAL HEALTH 414, LLC, NRC LICENSE NO. 34-32780-05

Dear Evan Western:

As transmitted by email on September 16, 2025, please find enclosed Amendment No. 9 to Cardinal Health 414, LLC's (your) U.S. Nuclear Regulatory Commission (NRC) Materials License No. 34-32780-05, issued in accordance with your letter dated June 18, 2025. As noted in our previous e-mail message, the amendment excludes the self-approval of non-medical authorized users of radioactive materials, under the license. Your letter is available electronically from NRC's Agencywide Documents Access and Management System (ADAMS) at accession number ML25169A149. NRC's ADAMS is accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please contact me at 630-829-9892 or via electronic mail at sara.forster@nrc.gov so that we may provide appropriate corrections and answers.

An environmental assessment for this action is not required since this action is categorically excluded under Title 10 of the *Code of Federal Regulations* (10 CFR) Section 51.22(c)(14).

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation; or imposition of a civil penalty; or an Order suspending, modifying, or revoking your license as specified in the NRC Enforcement Policy. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance that NRC expects of its licensees. The NRC Enforcement Policy is available at: <http://www.nrc.gov/reading-rm/doc-collections/enforcement/>.

Please note that additional information is needed to add an authorization for the self-approval of non-medical authorized users of radioactive materials, under the license. You may resubmit your request, including for consideration together with additional amendment requests submitted under NRC Mail Control No. 654343.

Unlike the non-medical authorized users of radioactive materials authorized in the main Cardinal Health Nuclear pharmacy license, the authorized users in your license are not primarily individuals associated with the accelerator production license, adjacent to the nuclear pharmacy. This license includes a broad scope authorization for a license authorizing up to 1 curie per radionuclide and 5 curies total of “any byproduct material with atomic numbers 1 through 83 ... with exceptions,” where exceptions include lutetium-177 and other radionuclides in quantities with possession limits exceeding the values in 10 CFR 33.100 Schedule A, Column I, typically associated with a Type A radioactive materials license of Broad Scope.

Accordingly, please refer to the criteria in NUREG 1556, Vol. 11, rev. 1, for the information needed to apply for a broad scope radioactive materials license, in accordance with 10 CFR Part 33. In the alternative, you may either:

- (1) request an exemption from the broad scope license requirements, by providing a letter requesting the same, and including information meeting the criteria in 10 CFR Part 30; or**
- (2) provide additional details as to (i) the groups of authorized individuals – i.e. Authorized Nuclear Pharmacists, quality assurance scientists, radiosynthetic chemists, etc. – who would be self-appointed by Cardinal Health; (ii) the training and experience requirements for each group; (iii) who – i.e. Radiation Safety Officer, Radiation Safety Committee, etc. – would review and approve the self-appointed non-medical authorized individuals; and (iv) a confirmation that documentation of the reviews and approvals will be maintained for at least 3 years, following the end of the individuals’ appointments as non-medical Authorized Users. Please note that the details for the non-medical authorized individuals should be as specific as possible, including the radionuclides, quantities, and authorized uses to be authorized.**

Please note that any updated request should be submitted under a signed and dated letter, and may be submitted electronically to r3-drssmail.resource@nrc.gov, for quickest processing.

The NRC’s Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency’s expectations for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC’s safety culture Web site at <https://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>.

We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS.

Sincerely,

Sara A. Forster, MS, Senior Health Physicist
Materials Licensing Branch
Division of Radiological Safety and Security
Region III

License No. 34-32780-05
Docket No. 030-39293

Control No.: 647358

Enclosure: Amendment No. 9 to NRC License
No. 34-32780-05

cc: Michael Stoner, Cardinal Health 414, LLC,
Loc. 7238,
michael.stoner@cardinalhealth.com

cc: Jacob Farkas, CNMT, MSHP, Radiation
Safety Officer, Cardinal Health 414, LLC,
Loc. 7238,
jacob.farkas@cardinalhealth.com