

From: [Sara Forster](#)
To: "Western, Evan"
Cc: "jacob.farkas@cardinalhealth.com"; [Still, Cami](#); "michael.stoner@cardinalhealth.com"
Subject: RE: Your Inquiry re Status Update and Amendment No. 09 to Cardinal Health 414, LLC, NRC License No. 34-32780-05, CN 647358
Date: Tuesday, September 16, 2025 8:39:00 PM
Attachments: image001.png
647358 License Am. 09 Cardinal Health to Lic. 34-32780-05 signed 20250916 sf public.pdf

Good evening, Evan:

Please find attached the referenced amendment to your radioactive materials license, which reflects the changes submitted, in part, via the June 18, 2025, letter. We were unable to include the authorization to self-appoint non-medical authorized users without additional information from you. Please note that this transmittal is preliminary, and we will be resending the license together with the cover letter, to include the deficiencies in the request, and additional information needed to complete the review.

We have noted that the underlying basis for allowing the self-appointing of non-medical authorized users under the Cardinal Health 414, LLC multi-site radiopharmacy license, NRC License No. 34-29200-01, in accordance with a December 18, 2006 letter (NRC's ADAMS Accession No. ML063550293), was primarily the overlap between the adjacent accelerator production (cyclotron) licenses and that license, where the Authorized Nuclear Pharmacists (ANPs) had very specific training and experience criteria requirements to be qualified. In the case of the Zionsville Rd. facility license, NRC License No. 34-32780-05, there are no ANPs listed on the license, or required, under the license. Accordingly, given the possession limits and radionuclides authorized, the current request to self-appoint AUs must meet either criteria for Licensees of Broad Scope, outlined in 10 CFR Part 33, or a license-specific exemption must be requested and approved.

If I am unable to connect with you regarding the issues identified in the review, I will reach out to Cami Still and/or the newly appointed RSO Jakob Farkas, CNMT, MSHP, to discuss the items, and to gain insight into your plans to respond to our request.

I have a number of meetings this week but am available on and off if you would like to connect before you leave town. Please send me an email if you have any questions.

Sincerely,

Sara

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