



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

August 11, 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. 660461**

Dear COL Reyes:

This is in reference to your letter dated August 6, 2026, requesting to amend NRC License No. 45-35423-01. In order to continue our review, we need the following additional information:

1. Enclosure 1, in support of the approval of LCDR Ryan W. Bauernfeind, identified Rene Michel as the supervising Associate Radiation Safety Officer (ARSO) in Section 5.b of the NRC Form 313A(RSO) from November 2024 through April 2026. The NRC does not retain records of more current DHA permits for the subject facility showing Rene's position as ARSO past June 12, 2025. Please either: (1) provide the DHA permit showing Rene Michel as ARSO of Naval Medical Center San Diego at least through at least April 2026; or (2) provide a supplemental written attestation, consistent with 10 CFR 35.50(b)(2), of other supervision sufficient to show one year of full-time radiation safety experience.
2. Enclosure 2, in support of the approval of 1LT Hakan Celik, identified Mark Ian Ramsey Daily as the supervising ARSO in Section 5.b of the NRC Form 313A(RSO) from January 2025 through May 2026. Please note that Mark Ian Ramsey Daily was not identified as the ARSO on the William Beaumont Army Medical Center permit until March 13, 2025. In addition, the NRC does not retain records of more current DHA permits for the subject facility identifying the ARSO after March 13, 2025. Please either: (1) provide the DHA permit showing Mark Ian Ramsey Daily as the ARSO of William Beaumont Army Medical Center through at least April 2026; or (2) provide a supplemental written attestation, consistent with 10 CFR 35.50(b)(2), of other supervision sufficient to show one year of full-time radiation safety experience.
3. Enclosure 4, in support of the approval of MAJ Trocia Clasp, identified Ammon Akazaki as the supervising ARSO in Section 5.b of the NRC Form 313A(RSO). The supervision is identified as from June 2021 through May 2023 at Fort Belvoir Community Hospital (Now Alexander T. Augusta Military Medical Center (AAMMC)), and January through March 2026 at Tripler Army Medical Center, though it is not clear which, if either, facility Ammon Akazaki was associated with. Based on available NRC records of these two permits, it is not clear whether or when Ammon Akazaki supervised MAJ Clasp as ARSO at either of these two facilities. In response, please provide:
 - a. The current DHA permit for Tripler Army Medical Center, as NRC records for Tripler are current as of March 2025, before the supervision period quoted, and

- b. A written description of the supervision by Ammon Akazaki sufficient to show one year of full-time radiation safety experience, including the position of Ammon Akazaki during the period of time quoted as it pertains to satisfying 10 CFR 35.50(b)(1)(ii);
 - c. As needed, supplementary written attestations to show the one year of full-time radiation safety experience for MAJ Clasp.
4. Enclosure 5, in support of the approval of SSgt Jovian M. Harris, identified MAJ Brett J. Mattison as the supervising ARSO in Section 5.b of the NRC Form 313A(RSO) from March 2025 – April 2026. The NRC does not retain records of more current DHA permits for the subject facility past the period of June 2025. Please either: (1) provide the DHA permit showing MAJ Brett J. Mattison as the ARSO of Mike O'Callaghan Military Medical Center through at least April 2026; or (2) provide a supplemental written attestation, consistent with 10 CFR 35.50(b)(2), of other supervision sufficient to show one year of full-time radiation safety experience.
5. Enclosure 6, in support of the approval for 1LT Wigberto Matos Cause, is supported by the supervision of Crystal A. Green, PhD, DABR, of Walter Reed National Military Medical Center. According to the timeline in Condition 22 of the DHA permit, Amendment No. 25:
 - From March 2023 and December 2024, no ARSO was identified on the permit,
 - Dr. Green was identified as the ARSO from December 12, 2024, through June 2025,
 - From June 12, 2025, through the time of this writing, Nsikak Okosi was identified as the ARSO of the permittee.

As a result of the above, please either: (1) provide a description for Crystal A. Green's supervision, as the period of time quoted in the NRC Form 313A (November 2024-March 2026) includes periods when Dr. Green was not identified as ARSO for this permittee, or (2) provide a supplemental written attestation, consistent with 10 CFR 35.50(b)(2), of other supervision sufficient to show one year of full-time radiation safety experience.

6. Enclosure 7, in support of the approval of 1LT William T. Ott, identified CPT Ashley N. Humbert as the supervising ARSO in Section 5.b of the NRC Form 313A(RSO) from April 2025 – April 2026. The NRC does not retain records of more current DHA permits for the subject facility past September 2024. Please either: (1) provide the DHA permit showing CPT Ashley N. Humbert as the ARSO of Blanchfield Army Community Hospital through at least April 2026; or (2) provide a supplemental written attestation, consistent with 10 CFR 35.50(b)(2), of other supervision sufficient to show one year of full-time radiation safety experience.
7. The following does not require any action, however, please take note of the following observations of your overall request:
 - a. Enclosure 1 to support the request for LCDR Ryan W. Bauernfeind includes the written attestation by Rene Michel, ARSO. The permit for Rene Michel appears to be misquoted as 24-NH rather than 124-NH for Naval Medical Center San Diego.

- b. Enclosure 2 includes supporting training certificates for 1LT Hakan Celik. Please note that the Armed Forces Radiobiology Research Institute "*Medical Effects of Ionizing Radiation Training Course*" certificate does not include the calendar year for this training.
- c. Your cover letter, as well as Enclosures 4 and 6, includes training authorizations that discuss Yttrium-90 microspheres. Consistent with the NRC's Yttrium-90 Microsphere Brachytherapy Sources and Devices TheraSphere and SIR-Spheres Licensing Guidance, Revision 10.2, Section 5.2 "*Radiation Safety Officer*," approval for one type of microsphere grants approval for the other type of microsphere (in contrast to Section 5.1 "Authorized Users").
- d. Enclosure 7 includes, for 1LT William T. Ott, the RASO Transportation of RAM course in February 2026 as Supervised Radiation Safety Experience (Section 5.b of the NRC's Form 313A). Classroom and laboratory training does not constitute supervised radiation safety experience.

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. 660461

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) 337-5021 or via electronic mail at Jason.vonEhr@nrc.gov.

Thank you for your cooperation.

Sincerely,

Jason vonEhr, Senior Health Physicist
Inspection and Licensing Branch - East
Division of Federal Materials Programs
Office of Nuclear Material Safety & Safeguards

License No. 45-35423-01
Docket No. 030-39046
Mail Control No. 659078