

FROM: Lester Tripp **/RA/**  
USNRC Region 1

TO: Jossian J. Pagán Lisboa  
Proposed Radiation Safety Officer  
Nuclear Cardiology Imaging, P.S.C

DATE: May 10, 2012

SUBJECT: NUCLEAR CARDIOLOGY IMAGING, P.S.C., REQUEST FOR ADDITIONAL  
INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO  
LICENSE, CONTROL NO. 577228

Dear Mr. Pagan:

This is in reference to your application dated March 22, 2012 requesting to amend Nuclear Regulatory Commission License No. 52-25558-01. In order to continue our review, we need the following additional information:

1. In support of your request to authorize Dr. Devarie for materials permitted under 10 CFR 35.100 and 200, please provide one of the following, as applicable:
  - a. Previous license number (if issued by NRC) or a copy of the license (if issued by an Agreement State) on which the physician was specifically named as an authorized user for the uses requested; or
  - b. Copy of the certification(s) for the board(s) recognized by NRC under 10 CFR Part 35, Subpart D; or
  - d. Description of the training and experience identified in 10 CFR Part 35 Subparts D, demonstrating that the proposed authorized user is qualified by training and experience for the use requested; and
  - e. Written certification, signed by a preceptor physician authorized user, that the above training and experience has been satisfactorily completed and that a level of competency sufficient to function independently as an authorized user for the medical uses authorized has been achieved; and
  - f. If applicable, description of recent related continuing education and experience as required by 10 CFR 35.59.

NRC Form 313A (attached) may be used to document this information. Please note that if the board certification, or training and experience, was received more than 7 years ago, evidence of recentness of training in accordance with 10 CFR 35.59 must also be submitted.

2. You have requested that Jossian Pagán be named Radiation Safety Officer (RSO) on your license. It appears that this individual may be an outside consultant\contractor. If this is so, in support of this request, please address the following:
- a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.
  - b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.
  - c. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).
  - d. Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.
  - e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 577228. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5358.

If we do not receive a reply from you within 20 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Please note that the Region I Division of Nuclear Materials Safety will be moving effective May 9, 2012. Our new address will be:

USNRC – Region I  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713