



March 14, 2013

Elizabeth Ullrich Senior Health Physicist  
U.S. Nuclear Regulatory Commission Region I  
Licensing Assistance Team  
Division of Nuclear Materials Safety  
475 Allendale Road  
King of Prussia, PA 19406-1415

Br. 2

SUBJECT: Amendment NRC Lic: 44-30124-01MD 030-33449

**Regional Administrator:**

PharmaLogic respectfully submits a request to amend the existing commercial nuclear pharmacy US NRC Radioactive Materials License # 44-30124-01MD to include the following change:

1. Remove the following commercial nuclear pharmacy location from the existing U.S. Nuclear Regulatory Commission Radioactive Materials License.

**PharmaLogic Ltd  
9 Krupp Dr.  
Williston, VT 05495**

The original nuclear pharmacy radioactive materials have been transferred to the new commercial nuclear pharmacy location.

**PharmaLogic Ltd  
1191 S. Brownell Road, Suite 30  
Williston, VT 05495**

The Iodine Exhaust System has been dismantled under the guidance of the Radiation Safety Officer. The exhaust duct work was surveyed for radiation exposure and removable contamination. Surveys revealed an exposure that did not exceed background at surface and 0 dpm and 0 dpm at the proximal and distal ends of the ductwork respectively.

Radiation surveys were performed thereafter at the Krupp Dr. pharmacy that confirms the absence of radioactive materials at the Krupp Dr. location. The survey results and survey diagrams and a completed NRC Form 314 are attached.

**PharmaLogic Ltd  
1191 S. Brownell Rd. ♦ Suite 30 ♦ Williston ♦ Vermont 05495  
802-862-9944 ♦ 802-863-1633 FAX**

580213  
**NMSS/RGNI MATERIALS-002**

REC RG10315-13AM1048

I wish to thank you for your consideration of this request. Upon review, if there are any questions, please contact me directly.

**Sincerely,**

A handwritten signature in black ink, appearing to read 'R. Sucese', with a stylized flourish extending from the end.

**Rich Sucese, RPh**  
**Radiation Safety Officer**  
[rsucese@pharmalogic.info](mailto:rsucese@pharmalogic.info)

**ATT: Radiation Survey Reports and Diagrams**  
**NRC FORM 314**



2/18/2013

### Iodine Room Survey and Wipes

Prior to our schedule pharmacy move into the new site, Iodine room glove box and fume hood will be surveyed and wiped daily (both inside and outside of each), excluding weekend. Values will be documented below. No I-131 doses for treatments or whole body scans will be compounding between 2/18 and the anticipated move date of 2/27.

Instruments: GM Meter: 110522; Ludlum SCA

Date	BKG mR/hr	Glove Box Survey	Fume Hood Survey	BKG CPM	Glove box wipe (inside/outside)	Fume Hood wipe (inside/out)	Initials
Mon. 2/18	0.01- 0.04	0.1	0.4	58	62/64	64/59	rs
Tues. 2/19	0.01- 0.04	0.08	0.4	70	74/73	69/67	rs
Wed. 2/20	0.02- 0.06	0.08	0.3	61	68/66	63/64	rs
Thru. 2/21	0.01- 0.04	0.08	0.3	65	66/69	62/64	rs
Fri. 2/22	0.01- 0.04	0.06	0.2	64	72/70	68/70	rs
Mon. 2/25	0.01- 0.04	0.04	0.2	61	62/66	61/65	rs
Tues. 2/26	0.01- 0.04	0.04	0.2	60	64/61	68/70	rs
Wed. 2/27	0.01- 0.04	0.04	0.04	69	57/60	62/60	rs

#### **PharmaLogic Ltd**

1191 S Brownell Rd, Ste 30 ♦ P.O. Box 786 ♦ Williston, VT 05495

**802-862-9944 ♦ Fax: 802-863-1633**



3/1/13

### Laminar Flow Hoods/Biological Safety Cabinet Survey and Wipes

Prior to our scheduled move 3/1/13, beginning at 0900, all hoods will be surveyed and wiped (results shown below) before any movers begin to dismantle and transfer the hoods to the new pharmacy.

Instruments: GM Meter: 110522; Ludlum SCA

<u>Item</u>	<u>Time</u>	<u>Bkg</u> (mR/hr)	<u>Survey</u> (mR/hr)	<u>Wipe Bkg</u> (dpm)	<u>Wipe</u> (dpm)	<u>RPh</u>
Waste Barrels	0713	0.01-0.04	0.04	160	161	rs
CRC-7	0714	0.01-0.04	0.04	151	160	rs
Horz. Flow Hood	0715	0.01-0.04	0.04	149	148	rs
Small L Block in BSC	0718	0.01-0.04	0.04	140	145	rs
BSC	0719	0.01-0.04	0.04	144	146	rs
Hood #2	0835	0.02-0.05	0.05	167	173	zw
Hood #1	0937	0.02-0.05	0.04	155	154	zw
I-131 cans	0941	0.01-0.04	0.03	155	147	zw
Pigs	0957	0.01-0.04	0.03	157	125	zw

**PharmaLogic Ltd**

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3/2/12

### Krupp Drive Facility Wipe Test Results

Instrument: Ludlum SCA

Background (average): 45 dpm

Area/Section	DPM
1 – Restricted Area (RA) unit dose counter	52
2 – RA DOT table	49
3 – RA DOT table	44
4 – RA Gen table	39
5 – RA Gen Box	56
6 – RA Iodine room counter	57
7 – RA Shipping counter	44
8 – RA Shipping counter	48
9 – RA breakdown room counter	50
10 – RA breakdown room counter	54
11 – RA breakdown room counter	60
12 – RA QC table	65
13 – RA sink	56
14 – RA processing counter	51
15 – RA prescription table	52
16 – RA prescription table	53
17 – RA compounding area floor	51
18 – RA compounding area floor	44
19 – RA gen room floor	46
20 – RA iodine room floor	52
21 – RA breakdown room floor	42
22 – RA ship area floor	46
23 – RA DOT area floor	49
24 – Non restricted area(NRA) desk	37
25 – NRA breakroom table	43
26 – NRA front office desk	37

**PharmaLogic Ltd**

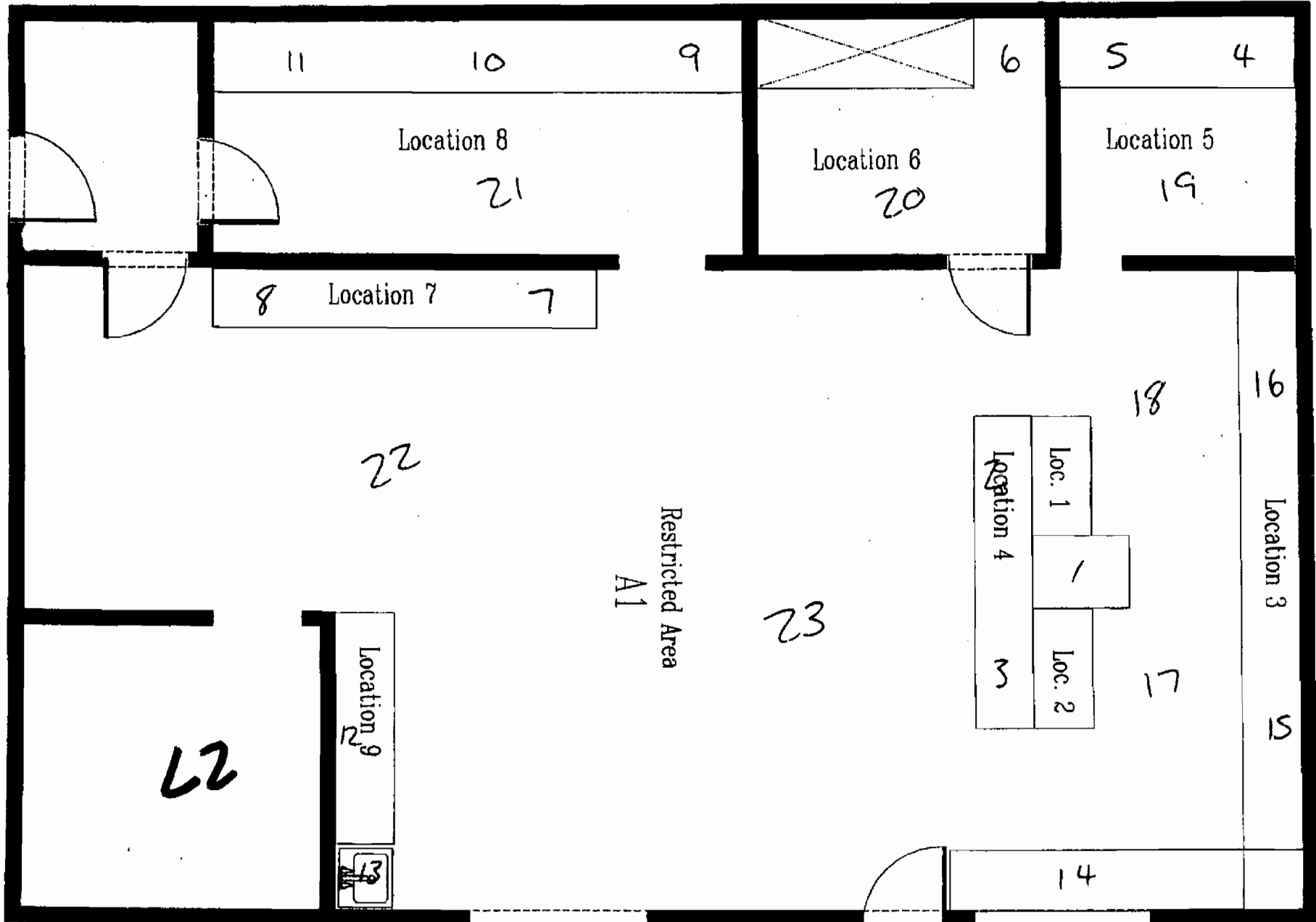
1191 S Brownell Rd, Ste 30 ♦ P.O. Box 786 ♦ Williston, VT 05495

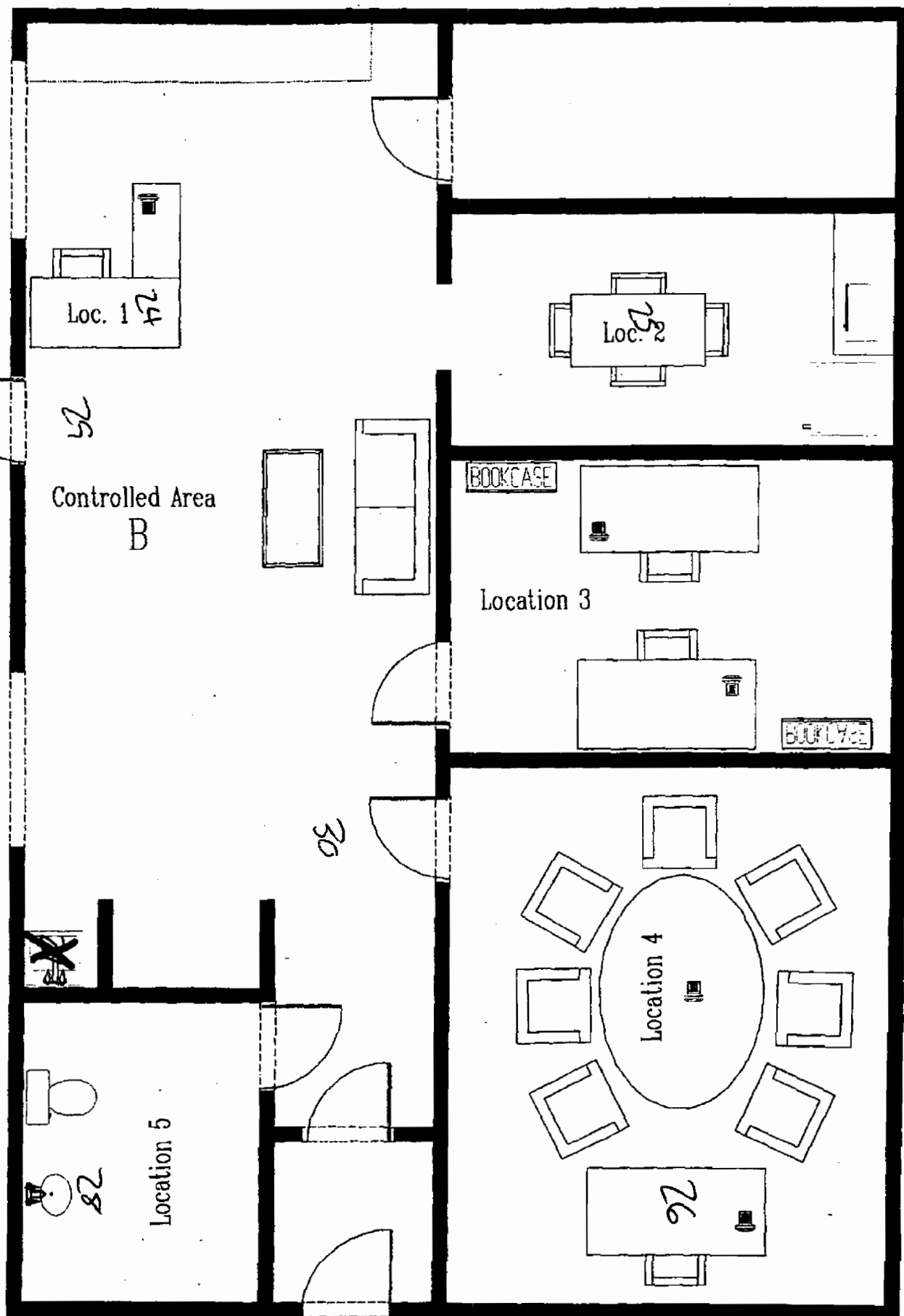
**802-862-9944 ♦ Fax: 802-863-1633**

27 – RA backroom floor	51
28 – NRA bathroom sink	49
29 – NRA floor	46
30 – NRA floor	56
A – Fume hood exhaust (FHE) lower section	54
B – FHE middle section	51
C – FHE upper section	51

A-Lower B-Middle  
C-Upper

Location 15







## CERTIFICATE OF DISPOSITION OF MATERIALS

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. Send comments regarding burden estimate to the Information Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0028), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

## LICENSEE NAME AND ADDRESS

PharmaLogic, Ltd  
9 Krupp Drive PO Box 786  
Williston, VT 05495

## LICENSE NUMBER

44-30124-01MD

## DOCKET NUMBER

## LICENSE EXPIRATION DATE

## A. LICENSE STATUS (Check the appropriate box)

- ☐ This license has expired. ☐ This license has not yet expired; please terminate it.

## B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

- ☐ 1. No radioactive materials have ever been procured or possessed by the licensee under this license.
- ☒ 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner.
- ☒ a. Transfer of radioactive materials to the licensee listed below:  
1191 S Brownell Rd, Ste 30 Williston, VT 05495
- ☐ b. Disposal of radioactive materials:
- ☐ 1. Directly by the licensee:
- ☐ 2. By licensed disposal site:
- ☐ 3. By waste contractor:
- ☒ c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

## C. SURVEYS PERFORMED AND REPORTED

- ☒ 1. A radiation survey was conducted by the licensee. The survey confirms:
- ☒ a. the absence of licensed radioactive materials
- ☐ b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
- ☒ 2. A copy of the radiation survey results:
- ☒ a. is attached; or ☐ b. is not attached (Provide explanation); or ☐ c. was forwarded to NRC on: \_\_\_\_\_ Date \_\_\_\_\_
- ☐ 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
- ☐ a. The results of the latest leak test are attached; and/or ☐ b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (Include Area Code)	E-MAIL ADDRESS
Rich Sucese	Radiation Safety Officer	802-862-9944	rsucese@pharmalogic.info

Mail all future correspondence regarding this license to:

## C. CERTIFYING OFFICIAL

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE

Rich Sucese, RSO

SIGNATURE



DATE

3/14/2013

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

This is to acknowledge the receipt of your letter application dated

03/14/2013, and to inform you that the initial processing which includes an administrative review has been performed.

☒ Amendment (44-30124-01MD)  
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 580213.  
When calling to inquire about this action, please refer to this control number.  
You may call us on (610) 337-5398, or 337-5260.