

**From:** [Lawyer, Dennis](#)  
**To:** ["bdavis@pharmalogic.info"](mailto:bdavis@pharmalogic.info)  
**Subject:** Pharmalogic LTD., Request for Additional Information Concerning Application for a License Amendment, Control 580213  
**Date:** Thursday, April 18, 2013 7:44:00 AM

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Dear Mr. Davis,

This is in reference to your letter dated March 14, 2013 and amended April 11, 2013, requesting for amendment to Nuclear Regulatory Commission License No. 44-30124-01MD. In order to continue our review, we need the following additional information:

1. Please provide the probe type, model number, and scan sensitivity of your instruments for the different radionuclides used at your facility. NUREG- 1757 Volume 1, "Consolidated Decommissioning Guidance, Decommissioning Process for Materials Licensees" simplified survey plan states to use an appropriate radiation instrument including scan sensitivity. With the given information, it is difficult to determine if appropriate scan sensitivity was used.
2. Please provide the instrument calibration dates and due dates for the two instruments used in the survey.
3. You noted that you had disbursed a unit dose of Metastron, which has <sup>89</sup>Sr isotope decaying by beta only. None of the wipes were counted utilizing a beta counter. Please perform wipes in the area where the Metastron dose was drawn and stored and submit beta measurement results.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office and refer to Mail Control No. 580213. If you have technical questions regarding this letter, please call me at (610) 337-5366.

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 <http://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.

*Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.*