

PETNET Solutions

April 13, 2015

Mr. Kevin Null
US Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Re: Reply to the NRC Form 699 Conversation Record (Docket No. 030-38230) dated April 9, 2015 regarding both the PETNET St. Louis RAM Licenses 41-32720-03 (Production) and 41-32720-04MD (Nuclear Pharmacy).

Dear Mr. Null:

Please accept this letter as PETNET's response to the Nuclear Regulatory Commission's (NRC) Conversation Record (Docket No. 030-38230) dated and received on April 9, 2015.

Action #1

Provide a description of any effort to date to dispose of any licensed material under both licenses.

Response to Action #1

PETNET has begun the process of surveying and removing laboratory equipment from the facility. These items were determined to be free of fixed and removable radioactive contamination, i.e., indistinguishable from background. Released items will be shipped and stored at Rowe Transfer, 5320 South National Drive, Knoxville, TN 37914. The survey report shall be available for review upon completion of the removal process.

Action #2

Include a commitment that material will not be used for any purpose, pending disposal.

Response to Action #2

PETNET commits that no material will be used for any purpose, pending disposal.

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Action #3

Describe where material will be stored and how it will be secured from unauthorized access.

Response to Action #3

All radioactive materials are properly stored in disposal containers and secured within the locked cyclotron room. Only authorized personnel have the access code to enter this area.

Action #4

Identify the individual who will be responsible for maintaining control of licensed material while it is in storage. Demonstrate that this person has a working knowledge of basic radiation safety practices and regulations.

Response to Action #4

Nicholas Ackles is responsible for maintaining control of licensed material during the closure transition. Mr. Ackles has been a radiation worker for the PETNET St. Louis staff for approximately 7 years. Mr. Ackles training certificates are enclosed (Attachment A).

Action #5

Describe a periodic inventory of material in storage to verify that the material remains in secured storage and is not being used.

Response to Action #5

Mr. Ackles is currently performing monthly inspections of the facility's remaining contents. As stated above, no material is being used for any purpose.

Action #6

Describe any planned changes to decrease or limit the radiation safety program as a result of placing material in storage, e.g., dosimetry program, training program, calibration services, etc.

Response to Action #6

PETNET has ceased the following radiation safety programs: 1) Effluent Monitoring, 2) Area Monitoring (i.e., dosimeters) in the pharmacy and garden area, 3) Radiation and

Contamination Surveys, 4) Audit Program, 5) Dose Calibrator Calibrations, 6) Transportation, and 7) RAM Distribution.

The following radiation safety programs are still in effect: 1) Personnel Monitoring (for Nick Ackles), 2) Inventory and Leak Test of Sealed Sources, 3) Waste Management, and 4) Survey Meter Calibrations. These programs will remain in effect until the site's decommissioning efforts have been approved by the NRC.

Action #7

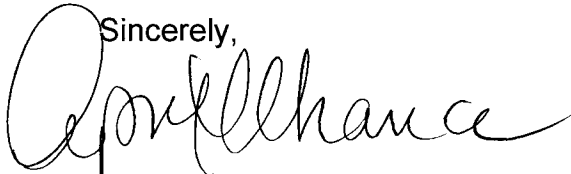
Commit to leak testing any sealed sources when they are removed from storage before they are transferred for disposal.

Response to Action #7

PETNET commits to leak testing any sealed sources upon removal from storage and prior to transfer for disposal.

Should you require additional information, please feel free to contact me at the number listed below or Ramón Davila at 865-218-3295 or ramondavila@siemens.com.

Sincerely,



April Chance, CHP
Senior Manager of Radiation Protection/Environment, Health & Safety
Molecular Technologies Division of Siemens Molecular Imaging
(PETNET, Cyclotrons and Sources)
810 Innovation Drive
Knoxville, TN 37932
(865) 308-3887 mobile
(865) 218-6355 office
april.chance@siemens.com

cc: Tigran Sinanian, RPh, BCNP, Sr. Director of Manufacturing Operations
Ramón Davila, MBA, RRPT, Regional Health Physicist
John Beyer, RPh, RSO, Regional Operations Director

Attachment A

Nicholas Ackles Training Certificates

Training Certificate

FILE COPY

CCF

This certificate is awarded to:

Nicholas Ackles

In recognition of successful completion of:

Operations I Training
Course #POP0505

December 5 - 7, 2007

Presented by PETNET® Pharmaceuticals, Inc.

SIEMENS

PETNET Solutions



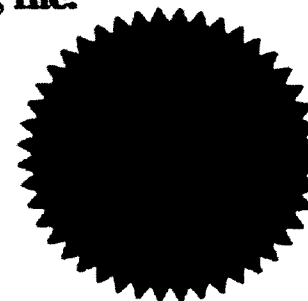
Instructor, Danny Bingham



Training Manager

December 7, 2007

Date Issued



Training Certificate

COPY

This certificate is awarded to:

Nicholas Ackles

**Radiation Protection Training
for Nuclear Pharmacy Employees**

December 5 - 7, 2007

This training is designed to satisfy the General Awareness, Function-Specific and Safety Training Requirement of 49 CFR 172.704(A).
Training was conducted by Siemens Medical Solutions Molecular Imaging Radiological Compliance Department for
PETNET Pharmaceuticals, Inc. in Knoxville, Tennessee.

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PETNET Solutions

Christi Elam, Regional Health Physicist

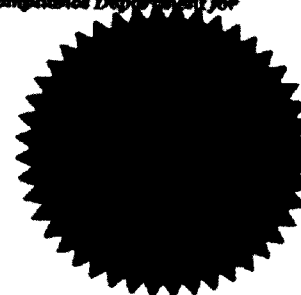
Instructor Name and Title



Instructor Signature

January 7, 2008

Date Issued



COPY

Training Certificate

This certificate is awarded to:

Nicholas Ackles

*In recognition of successful completion of the Transportation of Radioactive Materials Class,
in regulations of the United States Department of Transportation, concerning the legal
transportation of materials designated as hazardous and for achieving a passing grade.*

D.O.T./Hazardous Materials Training

December 7, 2007

*This training is designed to satisfy the General Awareness, Function-Specific and Safety Training Requirement of 49 CFR 172.704(A).
Training was conducted by Siemens Medical Solutions Molecular Imaging Radiological Compliance Department
for PETNET Pharmaceuticals, Inc. in Knoxville, Tennessee.*

SIEMENS
PETNET Solutions

Christi Elam, Regional Health Physicist

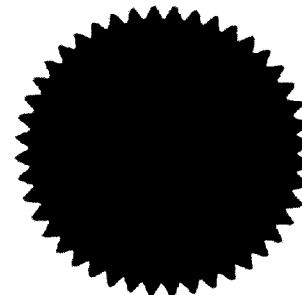
Instructor Name and Title



Instructor Signature

January 7, 2008

Date Issued



Boston



FILE COPY

Mr. Nicholas Ackles

has successfully passed the

Eclipse Cyclotron Professional Certificate

on May 27, 2008

with the following knowledge profile:

- Safety Issues
- Preventive Maintenance
- Corrective Maintenance
- System Trouble Shooting

Valid thru May 2010
Certified since May 2008

V. Kade

Training Center Erlangen
Date: May 27, 2008

NM12CLES

[Signature]

Instructor

SIEMENS
medical

Boston

FILE COPY Certificate

Mr. Nicholas Ackles

has attended the course

Advanced Eclipse Systems NMSECLIPS

from May 19, 2008 to May 30, 2008
at Knoxville, TN

with the following course contents:

- Review of Safety
- Vacuum system fault recovery
- Ion Source diagnostics and troubleshooting
- System calibrations
- RF Amplifier design and rebuild
- RF amp tuning and troubleshooting
- RF control system diagnostics
- Targetry troubleshooting
- Control system and interlocks troubleshooting
- Operating Software Upgrade and Maintenance

V. Friele

Training Center Erlangen
Date: 30.05.2008

N. Ackles

Instructor

medtrac

From: (865) 218-3295
 Ramon Davila
 PETNET Solutions, Inc.
 810 Innovation Drive
 Knoxville, TN 37932

Origin ID: RKWA



Ship Date: 14APR15
 ActWgt: 0.5 LB
 CAD: 105091792/NET3810

Delivery Address Bar Code



Ref # St Louis 50-919
 Invoice #
 PO #
 Dept #

SHIP TO: (630) 829-9854

BILL SENDER

Kevin Null
 US Nuclear Regulatory Comm. RIII
 2443 WARRENVILLE RD STE 210

LISLE, IL 60532

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 EXPRESS SAVER

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