



## CONVERSATION RECORD

7/30/2015

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Sharon Updike, consultant

DATE OF CONTACT

07/30/2015

TYPE OF CONVERSATION



E-MAIL



TELEPHONE



INCOMING



OUTGOING

E-MAIL ADDRESS

Sharon Updike &lt;supdike@mpcphysics.com&gt;

TELEPHONE NUMBER

(734) 662-3197

ORGANIZATION

The Imaging Center/Lutheran Hospital

DOCKET NUMBER(S)

030-33221

LICENSE NUMBER(S)

13-26508-01

CONTROL NUMBER(S)

588295

SUBJECT

Additional information needed for termination of license

SUMMARY

Please see the document I've attached. It contains information I use internally to evaluate close-out surveys and license termination requests, etc. I've marked the document in margins where information was incompletely provided. Some information listed was provided but some was not. For example, the licensee failed to provide a complete historical review of all materials authorized and possessed under the license, since its inception; not since its last renewal, from the beginning of the license. And, among other things, the document tells us when the survey instrument is due to be calibrated in 2016, which is meaningless. It needs to tell us when the instrument was last calibrated. Sections that are not marked indicate that section appeared to be ok.

If you want to discuss this with me, let me know and we'll set up a call.

**Continue on Page 2**

ACTION REQUIRED (IF ANY)

Written, complete, currently dated and signed response is needed, addressed to my attention at address shown in signature block below, within 15 days from July 30, 2015, (August 15, 2015) or contact me to make alternative arrangements. Please use control number 588295 as shown above.

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NAME OF PERSON DOCUMENTING CONVERSATION

Colleen Carol Casey

SIGNATURE

**CONVERSATION RECORD (continued)**

SUMMARY: (Continued from page 1)

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this record and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Colleen

Colleen Carol Casey

Materials Licensing Reviewer

U.S. Nuclear Regulatory Commission

Region III

2443 Warrenville Road

Suite 210

Lisle, IL 60532-4352

(630) 829-9841 Direct

(630) 515-1078 Fax

NRC 24 HR Operations Center

(301) 816-5100

Gentle Reminders: Unless previously arranged with or requested by me directly, please do not submit any licensing requests, responses or correspondence via e-mail.

Please only submit one complete, signed copy of your correspondence to us.

Please prepare your licensing requests in accordance with NUREG 1556 Series Guidance, as appropriate.

Thank you very much!

Please also note that my full-time work schedule includes every other Friday off.

Ensuring the health and safety of

our people, our nation and

our environment

<http://www.nrc.gov/>

**Please be reminded of the provisions in 10 CFR 30.9(a), "Completeness and accuracy of information,"..."(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee *shall be complete and accurate in all material respects.*"**

We cannot authorize licensees to release the "locations/addresses of use" or "areas of use" from licenses for unrestricted use (even by other staff members) until we have received and reviewed a copy of the results of final status surveys, i.e., "decommissioning" and "close-out surveys," for the affected facilities.

The final status surveys must include a complete historical review of all *actual licensed materials possessed, used, stored, etc.*, including sealed sources and unsealed materials, spills, and contamination.

If sealed sources were transferred or disposed of as part of the close-out of this license, please provide a copy of the final leak test for each sealed source; a copy of an acknowledgment of receipt from the licensed entity who took possession of each source, with an appropriate level of detail to identify the source and recipient; and if the recipient/transferee is an Agreement State licensee, please include a current copy of its license that clearly shows it is licensed to receive your sources.

If unsealed materials, including waste streams or waste materials (including those under 10 CFR 35.92, if applicable) were transferred or disposed of as part of the close-out of this license, please provide a copy of an acknowledgment of receipt from the licensed entity who took possession of each material; and if the recipient/transferee is an Agreement State licensee, please include a current copy of its license that clearly shows it is licensed to receive your materials.

For waste materials transferred, include the final records for any waste materials transferred or disposed of, pursuant to 10 CFR 35.2092. Do not submit all records of waste disposal, only the final records for transfer or disposal, to support the assertion that the facilities contain no residual radioactive materials in any form.

Please note that bills of lading, shipment manifests and shipping papers do *not* usually contain sufficient information to demonstrate that materials have been safely received by an appropriately licensed entity. They typically indicate that materials were prepared for shipment or transfer only, not that they were received and accepted into the recipient's inventory under its license.

The following references may assist you: 10 CFR 30.41; 10 CFR 30.51; 10 CFR 35.13; 10 CFR 35.14; 10 CFR 35.92; 10 CFR 35.2092; NUREG 1556 Vol. 9, Rev. 2, section 11, "Termination of Activities," (if you have a medical program; check the "Termination of Activities" section in other volume(s) in the NUREG 1556 series for other than medical programs at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>); "NRC Form 314" at <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc314.pdf>; and NUREG 1757, Vol. 1, Rev. 2 at <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v1/>.

Your complete historical review should specify when and where all licensed materials, including materials in 10 CFR 31.11, were actually possessed under the license, beginning with the original issuance of the license, and used, when the last use was for each material or modality and how, when and by whom were the materials disposed of (shipped off site, decayed -in-storage, sanitary sewer disposal, etc.) or transferred.

If your license historically authorized radioactive materials and/or modalities that you never used, then please so state specifically. Please be mindful that NRC will review your inspection history.

Please respond by stating exactly which licensed materials were used at this location historically and please submit final status survey information covering those radioactive materials.

The final status surveys should consist of exposure rate measurements to show that all sources of radioactive material have been removed, and contamination checks of areas where radioactive materials were used or stored.

Radiation levels associated with surface contamination and removable contamination should not exceed those specified in your license or in NUREG 1757 Vol. 1, Rev. 2 at:  
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v1/>

Please submit the following information with your close-out survey:

- a. Diagrams of each facility (area(s) of use and/or locations/addresses of use) with exposure rate survey and wipe test results keyed to specific locations, as appropriate. Specify type of surface surveyed (floor, countertop, doorhandle, sink, etc.) and at what distance, if exposure rate surveys.  
Meaningful units (milliroentgen, millirem, dpm, etc.) should be stated. Gross results and/or net results should be stated and described appropriately.
- b. The name of the person(s) performing the survey.
- c. The date(s) the survey was performed.
- d. The instrument(s) used for exposure rate measurements and for analysis of the wipes. Include manufacturer's names and model numbers to ensure clarity.
- e. Background readings and each instrument's efficiency or correction factor.
- f. The date(s) that the survey instrument(s) were last calibrated. Please *do not* state when the instrument(s) are "due" to be calibrated in the future as this is not meaningful information. Please *do* state when the instrument(s) were last calibrated.
- g. The action levels for both exposure rate measurements and wipe tests. Include the functional identity of areas exceeding these levels, corrective actions taken and results of corrective actions taken, including re-testing results. A reasonable sampling of all surfaces likely to exhibit residual radioactive material or to contain radiation sources should be taken.
- h. If sealed sources were used in the affected areas/locations, please include a copy of the most recent leak test results for each source. If sources were transferred, please provide the license number (if a current Region III NRC licensee) or a copy of the license for the transferee, or a copy of the license and/or permit for the broad scope licensee who took possession of the sources. Appropriate acknowledgment(s) of receipt should be submitted for "cradle to grave" accountability.

Also, please always include the telephone number and fax number of at least one person who serves as a point of contact for all future licensing requests. It is also helpful to provide us with the email address of at least one contact person.

Please ensure that a senior management representative signs the amendment request. Please ensure that a management representative signs the amendment request, in accordance with 10 CFR 35.12(a), as appropriate, for medical programs.

Colleen Card Carey  
7/29/15