

April 19, 2016

Materials Licensing Branch  
U.S. Nuclear Regulatory Commission, Region III  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

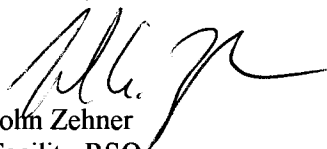
Dear Mr. Null,

Subject: Additional information to control number 590094.

Please find the response to your conversation record dated April 15, 2016.

We are prepared to discuss in more detail or provide additional information to support your review. If additional information is required, please contact me at (317) 578-1251. Thank you for your assistance in this process.

Sincerely,



John Zehner  
Facility RSO  
Zevacor Molecular

Attachments:

1. List of Sealed Sources with model numbers

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**Answer to Questions:**

- 1. The sealed source model numbers that you provided appear to be exempt quantity sources and as such, do not need to be listed on your license. Also, Eckert & Ziegler stated that the two serial numbers that you provided for the mixed gamma sources do not match anything that they have. Please clarify which qualify as exempt sources, and whether or not you want them listed on your license.**

Please see the attached list of sealed sources with model numbers.

- 2. Please submit a standby trust agreement which is a requirement to accompany your executed bond for decommissioning financial assurance.**

The standby trust agreement is currently being completed. It will be submitted once it is completed.

- 3. Describe the overall length of the training session and approximate time that will be spent on each topic. Also describe how attendees' understanding will be evaluated at the end of the training.**

Zevacor Molecular currently utilizes Nuclear Education Online (NEO) for our company radiation safety training. NEO is a nationally recognized company providing radiation safety training for multiple companies in the U.S.

NEO's online training consists of the following subject matters:

- Fundamentals of Radiation and Radioactivity
- Radiation Biology
- Radiation Dose Limits and ALARA
- Personnel Monitoring
- Access Control and Postings
- Emergency and Spill Procedures
- Radiation Dose Limits Contamination Control
- Employee Responsibilities

Upon completion of the online training, each employee is required to pass a final exam over the presented material. If an employee fails to pass the required exam, the employee will be retrained until the employee passes the final exam and demonstrates understanding of the material.

The total time for the training and final exam is approximately 90 minutes.

- 4. Please justify your statement that only workers who work with curie levels of licensed material will be assigned extremity dosimetry on both hands.**

Individuals handling mCi amounts of licensed material will be assigned extremity dosimetry on both hands.

- 5. Commit to continuous air monitoring outside of the cyclotron vault area while operations are being conducted to detect an unexpected airborne release into worker breathing zones.**

Zevacor confirms that continuous air monitoring outside of the cyclotron vault area while operations are being conducted to detect an unexpected airborne release into worker breathing zones.

Upon startup, Zevacor will complete surveys to evaluate if continuous air monitoring is necessary. After the completion of the surveys and if it is determined that continuous air monitoring is not needed, Zevacor will send the results to the NRC to amend the license condition.

- 6. Describe a pressure drop value across filters that would necessitate filter change-out.**

Zevacor confirms that a pressure drop above 1.5 inches w/c will necessitate a filter change-out.

- 7. Modify your procedure for storing short lived waste for decay to decay to include a step that requires the waste be surveyed before disposal.**

Zevacor confirms that radiation surveys will be conducted on short lived waste before disposal.

## Zevacor Molecular Sealed Sources

<b>Isotope Name</b>	<b>Model Number</b>	<b>Vendor</b>	<b>Activity</b>	<b>Location</b>
Cs-137 (Vial)	BM06E-37	RadQual	0.212mCi	Pharmacy
Co-57 (Vial)	BM06E-57	RadQual	5.16mCi	Pharmacy
Ba-133 (Vial)	BM06E-33	RadQual	0.262mCi	Lab

ORIGIN ID: MZZA (317) 578-1251  
ZEVACOR MOLECULAR

14395 BERGEN BLVD.

NOBLESVILLE, IN 46060  
UNITED STATES US

SHIP DATE: 19APR16  
ACTWGT: 1.00 LB  
CAD: 105219914/NET3730

BILL SENDER

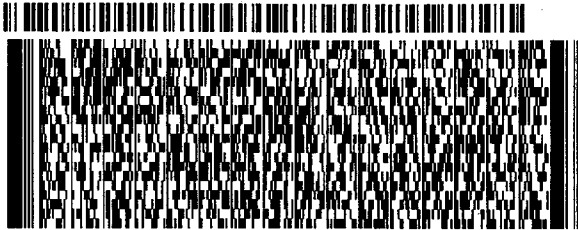
TO **MATERIALS LICENSING BRANCH  
NUCLEAR REGULATORY COMMISSION  
2443 WARRENVILLE ROAD  
SUITE 210  
LISLE IL 60532**

(317) 578-1251  
INV.  
PO

REF:

DEPT:

540J11042727F



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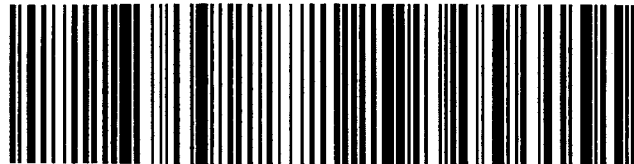
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7761 4293 6546

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PRIORITY OVERNIGHT

**NA ENLA**

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IL-US ORD



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