

From: [Nguyen, Janice](#)
To: [Eli A. Port](#)
Cc: apark@petvetcarecenters.com
Subject: NRC Request for Additional Information for Radiocat, PC (Mail Control Number 611797)
Date: Tuesday, June 11, 2019 3:28:00 PM

Licensee: Radiocat, PC
License No: 45-25330-01
Docket No: 030-33825
Control No: 611797

Dear Mr. Port,

Could you please reply back to confirm receipt?

This is in response to Radiocat, PC's letters dated December 20, 2018 (received April 3, 2019) and April 18, 2019, requesting a name change and approval for a direct transfer of control. In order to continue our review, please provide the following additional information:

1. Please confirm the name that should be listed on the license, and provide supporting documentation. Previously, the licensee name was Radiocat, LLC. In your license renewal application, you indicated the name was Radiocat, PC. In our request for additional information dated October 23, 2015, we asked you to confirm the name, and to indicate if the company had been restructured or if a transfer of control had occurred. In your response dated November 24, 2015, you stated the following:

The name on the application, Radiocat, PC, is correct. The company has not been restructured and no change of ownership has occurred. At the time of July 14, 2000 application, the location of use was Radiocat, LLC in Springfield, Virginia. Other locations of use were added and Virginia became an Agreement State and was removed from the license. The other locations are correctly named Radiocat, PC.

2. Since this action involves a transfer of control, the April 18, 2019 letter should have been signed by the owners/senior management of Radiocat, PC (Rand S. Wachstock, DVM and David S. Herring, DVM) and PetVet Radiocat, LLC. In your reply to this letter, please have correspondence signed by owners/senior management of both entities, and please confirm that they abide by all statements and commitments made in the April 18, 2019 letter.
3. Please confirm that there are no changes in staff duties that relate to the licensed program, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.
4. Please describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination and whether contamination will occur prior to transfer. Please include the status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.
5. Please confirm that all records concerning the safe and effective decommissioning

of the facilities will be maintained at their current sites. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.

6. Please confirm that both transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer, and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.
7. Please confirm that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.

The above information is taken from NUREG-1556, Volume 15, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Material Licenses." The notice of the sale was posted to the NRC's website on June 10, 2019, and per 10 CFR 2.1305, the public has 30 days to provide comments for the NRC's consideration. If you or your representatives have any questions, please feel free to contact me.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov<<http://www.nrc.gov>>; select Nuclear Materials; Med, Ind, & Academic Uses; then Licensee Toolkits, see our toolkit index page. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

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/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."

You may respond to my attention in writing by letter, email (if letter is signed by senior management and scanned into a pdf format), or fax (610-337-5269), referencing mail control number 611797. Please reply within 30 days.

Thank you for your cooperation. Please feel free to contact me by telephone or e-mail if you have any questions.

Jan

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