



August 8, 2019

U.S. Nuclear Regulatory Commission, Region 1
2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19406-2713

RE: 47-25570-01, Control Number 612513

Dear Ms. Lanzisera,

Thank you for taking the time to review my request to add Authorized Users. In response to your request, I have attached a copy of VA permit number 37-00595-01, listing Drs. Pagano, Do and Essel as Authorized Users.

I would also like to confirm the spelling of Dr. Seigler on 47-19919-01.

If you require anything further at this time, please contact me.
Sincerely,

A handwritten signature in dark ink, appearing to read "Kay Kassel".

Kay Kassel MS
Corporate Radiation Safety Officer
Office 561.701.1311
Fax 480.212.8560
kkassel@alliancehealthcareservices-us.com
18201 Von Karman #600
Irvine, CA 92612

**DEPARTMENT OF
VETERANS AFFAIRS**

Memorandum

Date: December 27, 2018

From: Interim Director, VHA National Health Physics Program (NHPP) (115HP/NLR)

Subj: VHA Permit Number 37-00595-01 (for radioactive materials use)

To: Director (595/00), Lebanon VA Medical Center, Lebanon, Pennsylvania

1. We are forwarding the attached Amendment No. 12. The amendment is issued based on your request of November 15, 2018, to add Dr. Adwoa Essel as an authorized user and reauthorize the use of 35.300 material.
2. With the reauthorization of 35.300 use, previous permit commitments related to 35.300 materials continue to be applicable to permit activities.
3. As announced in the March/April 2018 *NHPP Scatterings*, NHPP will no longer mail paper copies of amended permits. We included your Radiation Safety Officer as an addressee on the Email transmitting this permit amendment.
4. You should review the permit amendment carefully to ensure you understand current permit approvals and conditions. This permit is assigned program code 2120 for limited-scope medical uses.
5. You may contact Kim Wiebeck, at (850) 293-9759, if you have any questions about this matter.

Paul L. Yurko
400994

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Paul L. Yurko

Attachment

Department of Veterans Affairs

Page 1 of 2 pages	MATERIALS PERMIT	Amendment No. 12
In accordance with VHA Directive 1105 and reliance on statements made by the applicant, permission is hereby granted to receive, possess, transfer, and store radioactive materials listed below, and to use this material for the purpose and at the places listed below.		
Permittee 1. VA Medical Center 2. 1700 South Lincoln Avenue Lebanon, Pennsylvania 17042	3. In accordance with your request of November 15, 2018 , Permit Number 37-00595-01 is amended to read as follows. <hr/> 4. Expiration date: September 30, 2027 <hr/> 5. Docket or Reference Number: N/A	

- | | | |
|---|--|---|
| 6. Byproduct, source, and/or special nuclear material

A. Any byproduct material permitted by 10 CFR 35.100

B. Any byproduct material permitted by 10 CFR 35.200

C. Any byproduct material permitted by 10 CFR 35.300 | 7. Chemical and/or physical form

A. Any

B. Any

C. Any | 8. Maximum amount permittee may possess at any one time under this permit

A. As needed

B. As needed

C. 37 gigabecquerels (1 curie) |
|---|--|---|

9. Authorized Use.
- A. Any use permitted by 10 CFR 35.100.
 - B. Any use permitted by 10 CFR 35.200.
 - C. Any use permitted by 10 CFR 35.300.

CONDITIONS

10. Permitted material may be used or stored only at the permittee's facilities located at 1700 South Lincoln Avenue, Lebanon, Pennsylvania.
11. The Radiation Safety Officer for this permit is Adam M. Henry, MS. A written continuity plan for a qualified Radiation Safety Officer shall be kept current and be approved, annually, by the Radiation Safety Committee. If the Radiation Safety Officer permanently discontinues duties under this permit, the permittee shall immediately notify the National Health Physics Program. Permit activities must cease without a qualified Radiation Safety Officer who meets Nuclear Regulatory Commission requirements.
12. Permitted material is only authorized for use by, or under the supervision of:
- A. Individuals permitted to work as an authorized user and/or authorized nuclear pharmacist in accordance with 10 CFR 35.13 and 35.14.
 - B. The following individual is an authorized user for the materials and uses indicated.

Authorized User	Material and Use
Mario M. Pagano, M.D.	35.100, 35.200
Vu Quoc Do, M.D.	35.100, 35.200
Adwoa Essel, M.D.	35.100, 35.200, 35.300

**MATERIALS PERMIT
SUPPLEMENTARY SHEET**

Page 2 of 2

Permit Number: 37-00595-01

Docket or Reference Number: N/A

Amendment No. 12

13. This permit does not authorize commercial distribution of permitted material.
14. Sealed sources containing permitted material shall not be opened or sources removed from source holders by the permittee.
15. The permittee is authorized to transport permitted material only in accordance with the provisions of 10 CFR 71, "Packaging and Transportation of Radioactive Material."
16. A. The permittee shall conduct physical inventories to account for all sealed sources and/or devices received and possessed under this permit:
- (1) Quarterly, for sealed sources with either current activity greater than 1 millicurie or current activity greater than 1000 times the quantities in 10 CFR 20, Appendix C.
 - (2) Semiannually, for all other sealed sources, except sources specifically exempted by 10 CFR 30.
- B. The permittee shall maintain records for 3 years from the date of each inventory and include the radionuclides, quantities, manufacturer's name and model numbers, location of the sources and/or devices, and the date of the inventory.
- C. The permittee shall classify sealed sources, not in active use for their intended clinical or research purpose for a period of 24 months, as disused sources and evaluate the disused sources for disposal as expeditiously as possible.
- D. The permittee shall provide oversight for security of radioactive materials by:
- (1) Compliance with regulations per 10 CFR 20.1801 and 10 CFR 20.1802.
 - (2) Prevention of adversary or unauthorized removal of, or access to, radioactive materials.
 - (3) Use of two delay methods for sealed sources not in use.
 - (4) Focus to security commensurate with possible risks of radioactive materials unauthorized use.
17. Except as specifically provided otherwise in this permit, the permittee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. This permit condition applies only to those procedures required to be submitted in accordance with the regulations. Additionally, this permit condition does not limit the permittee's ability to make changes to the radiation protection program as provided for in 10 CFR 35.26. The Nuclear Regulatory Commission regulations shall govern unless the statements, representations, and procedures in the permittee's application and correspondence are more restrictive than the regulations.
- A. August 21, 2017, Renewal Application
- B. May 11, 2018, Memorandum [delete authorized user, J. Urbain and 10 CFR 35.300 use]
- C. **November 15, 2018, Memorandum** [add authorized user and 10 CFR. 35.300 use]

FOR THE DEPARTMENT OF VETERANS AFFAIRS

Date December 27, 2018

By Paul L. Yurko
400994
Paul L. Yurko, MS
Interim Director, National Health Physics Program
North Little Rock, Arkansas

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Paul L. Yurko 400994
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