From:	Nguyen, Janice
To:	vvim@vvim.com
Cc:	Pfingsten, Jonathan
Subject:	CATAMOUNT VETERINARY SPECIALTY AND EMERGENCY HOSPITAL PC, D/B/A BURLINGTON EMERGENCY & VETERINARY SPECIALISTS, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 612372
Date:	Monday, August 26, 2019 4:18:00 PM

Licensee: Catamount Veterinary Specialty and Emergency Hospital PC
d/b/a Burlington Emergency & Veterinary Specialists
License No. 44-31369-01
Docket No. 030-38029
Mail Control No. 612372

PLEASE CONFIRM RECEIPT OF THIS REQUEST FOR ADDITIONAL INFORMATION BY RETURN EMAIL

Dear Dr. Harnett:

This is in reference to your application dated May 18, 2019 and letter dated July 28, 2019, requesting to renew NRC License No. 44-31369-01. Additional information is needed in order to continue our review. All item numbers referenced correspond to Appendix B of NUREG-1556, Volume 7, Revision 1, "Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope," which was revised in February 2018, and can be located here: https://www.nrc.gov/docs/ML1806/ML18065A006.pdf. Please provide the following information:

1. Item 3, "Address Where Licensed Material Will Be Used or Possessed" – Your application requests the removal of your former location of use (200 Commerce St. Williston, VT) from your license. Please provide copies of close-out area surveys, including wipe test results, and any material/waste/sealed source transfer or disposal records, if applicable. When this location is removed from your license, it can then be released for unrestricted use.

2. Item 5 – Please indicate if you possess any sealed sources, including limited quantity and exempt sources, for quality control testing on instrumentation. For sealed materials:

    a. Identify each radionuclide (element name and mass number) that will be used and specify the maximum activity per source. Also, specify the maximum number of sources or total activity for each radionuclide.

    b. Provide the manufacturer's or distributor's name and model number for each sealed source and device requested.

    c. Confirm that each sealed source, device, and source/device combination is registered as an approved sealed source or device by

NRC or an Agreement State and will be possessed and used in accordance with the conditions specified in the registration certificate. Provide the SSD registration certificate number, if available.

d. For each sealed source, device, or source and device combination that is not registered, provide the applicable information, as described in 10 CFR 30.32(g) and 32.210.

3. Item 5 - Please state the following: "Pursuant to 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g) and 10 CFR 70.51(b)(3), as appropriate, we will maintain records important to decommissioning and transfer these records to an NRC or an Agreement State licensee before licensed activities are transferred or assigned, in accordance with 10 CFR 30.34(b), 10 CFR 40.46, and 10 CFR 70.36, as appropriate. Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), and 10 CFR 70.51(a)(3), as appropriate, prior to license termination, we will forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), and 10 CFR 70.25(g), as appropriate, to the appropriate NRC Regional Office."

4. Item 8 – Your radiation safety training program did not contain all applicable topics that should be covered, groups of workers, assessment of training (what grade on the test is considered passing), and qualifications of instructors. Please provide this information. The guidance in Appendices D and F of this NUREG may be used to develop a training program. The program should consider both the topics pertinent for each group of workers and the method and frequency of training.

5. Item 9 – Please confirm that the 1417 Marshall Avenue facility was built in accordance with the shielding specified in letter dated January 14, 2019, and that all statements made in letters dated January 14, 2019 and February 22, 2019 are still accurate. In addition, on the facility diagram, please include the area(s) assigned for the receipt, storage, security, preparation, measurement, use, and disposal of radioactive materials.

6. Item 9 – Given the potential for radioactive materials to become airborne, please provide diagrams containing schematic descriptions of the ventilation systems, with pertinent airflow rates, pressures, filtration equipment, and monitoring systems.

7. Item 10, "Radiation Monitoring Instruments" – Please provide the manufacturer and model number associated with the GM survey meter and pancake probes, as well as other relevant information including sensitivity or efficiency. In addition, please indicate what equipment will be used to measure wipes for removable contamination.

8. Item 10, "Instrument Calibration" – Your updated application requests

authorization to calibrate your own survey instruments. This would be considered a significant change to your radiation safety program, especially given that you are not currently authorized to possess any sources that would meet the requirements for calibrating survey instruments.

If you instead intend to have your survey meters calibrated by a vendor, please update your commitment and state that "Instruments will be calibrated before first use, at least annually thereafter, and after any repair, by a vendor that the NRC or an Agreement State has licensed to perform instrument calibration." If you are seeking to calibrate your own survey instruments, you will need to provide the following additional information in accordance with Appendix I:

a. Evidence of classroom training covering the required topics

b. Evidence of on-the-job training pertaining to instrument calibration

c. Discussion on the frequency of calibrations

d. Description of the procedures used to calibrate your survey meters

e. Description of the facilities and postings, including a description of any geometric considerations, anticipated doses to workers and public, storage of the calibration source

f. Description of the calibration source, including isotopic information, activity, collimation and calibration field accuracy

9. Item 10, "Material Receipt and Accountability" – If you possess non-exempt sealed sources, please provide the following statements:

   a. State that: "Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license. Records of inventory will be maintained for a period of 5 years from the date of each inventory, and will include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory." OR

   b. Provide a description of the procedures for ensuring that no sealed sources have been lost, stolen, or misplaced.

10. Item 11, "Leak Tests" – If you possess non-exempt sealed sources, please provide the following statements:

    a. State that "Leak tests will be performed at the intervals approved by the NRC or an Agreement State and specified in the SSD

registration certificate." AND

b. If leak tests will be analyzed by an outside entity, state: "Leak tests will be analyzed by an organization authorized by the NRC or an Agreement State to provide leak testing services to other licensees. Leak tests may be collected by the licensee, using the sealed source or plated foil manufacturer's (distributor's) and the leak test kit supplier's instructions. Such leak test kits will be supplied by an organization authorized by the NRC or an Agreement State to provide leak testing services." OR

c. If leak tests will be analyzed by the applicant, state: "We will implement the model leak test program published in Appendix N in NUREG-1556, Volume 7, Revision 1 "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Academic, Research and Development, and Other Licensees of Limited Scope." OR

d. Submit a description of alternate equipment or procedures to evaluate a radiological hazard and for determining whether there is radioactive leakage from sealed sources.

11. Item 11, "Waste Management" – Please confirm you will only utilize the decay-in-storage method of disposal. If you intend to utilize any other methods of disposal or waste management, including disposal of liquids into sanitary sewage or compaction, please provide the following:

    a. If you wish to use more than just the decay-in-storage method, state: "We will use the model waste procedures published in Appendix P in NUREG-1556, Volume 7, Revision 1, 'Program-Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope.'" AND

    b. If you wish to compact or incinerate radioactive waste, provide the requested information concerning these activities in Appendix P of the referenced NUREG guidance.

12. Appendix D, "Guidance for Laboratory Animal and Veterinary Medicine Uses" – Provide a description of your criteria for release of cats treated with licensed materials from veterinary activities, and the instructions you provide to caretakers of animals administered radiopharmaceuticals. Written instructions should address, at a minimum: (i) waste handling, (ii) contamination, and (iii) human interaction with instructions for isolation of the animal, and should include the name of a knowledgeable person to contact and that person's telephone number, in case the caretaker has any questions.

13. Appendix D – Please describe how licensed materials will be obtained,

such as in unit doses from a radiopharmacy.

We will continue our review upon receipt of the requested information. 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 612372. Please provide a response within 10 calendar days.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding medical uses of radioactive materials may be obtained on the NRC Web Site at: http://www.nrc.gov/materials/miau/med-use-toolkit.html. This site also provides the updated Training and Experience NRC Form 313A series of forms and guidance, as well as information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: http://www.nrc.gov/reading-rm/adams.html. Please be aware that you may request that certain portions of your submittal to NRC be withheld form public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact Janice Nguyen at 610-337-5006 or via electronic mail at Janice.Nguyen@nrc.gov or contact Jonathan Pfingsten at 610-337-5170 or via electronic mail at Jonathan.Pfingsten@nrc.gov.

Thank you for your cooperation.

Sincerely,

Jan

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