NRC FORM 699
(11-2017)

U.S. NUCLEAR REGULATORY COMMISSION

CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU	DATE OF CONTACT	TYPE OF CONVERSATION
Joseph J. Mueller	10/04/2019	☐ E-MAIL ☑ TELEPHONE ☐ INCOMING ☑ OUTGOING
E-MAIL ADDRESS jmueller@cava.cc	**TELEPHONE NUMBER** 248-365-6896	
ORGANIZATION CAVA Associates, P.C.	**DOCKET NUMBER(S)** 030-35016	
LICENSE NAME AND NUMBER(S) CAVA Associates, P.C. 21-32177-01	**MAIL CONTROL NUMBER(S)** 613899	

SUBJECT

Pending Renewal of NRC License - Additional Information Required

SUMMARY AND ACTION REQUIRED (IF ANY)

The is a summary of the conversation that occurred between Laura Cender and Joseph Mueller on Oct. 4, 2019 regarding the pending NRC license renewal application dated August 5, 2019.

Please provide your appropriately signed and dated response to the following items by no later than Friday Nov. 8, 2019. You may submit your response via fax to 630-515-1078.

1. In Item 2 of the submitted NRC Form 313 the business name is listed as Cardiology and Vascular Associates, P.C., while the business name listed on your NRC license is CAVA Associates, P.C. Please indicate which name you would like to have listed on the license. If you do request to change the name listed on the license, please additionally provide a statement confirming that no change in company ownership or transfer of the license constituting a change of control as described in 10 CFR 30.34(b) has occurred.

2. Please indicate the title of the certifying officer, Kirit Patel, M.D., who signed the NRC Form 313 (i.e. CEO, owner, etc.)

3. Please submit a copy of the delegation of authority memo formally appointing you to the position of Radiation Safety Officer. The memo is to be signed by both yourself and your executive management responsible for oversight of the radiation safety program. The memo must be prepared in accordance with the requirements of 10 CFR Parts 35.24(b), 35.24(e), and 35.24(g).

NAME OF PERSON DOCUMENTING CONVERSATION

Laura B. Cender

SIGNATURE	DATE OF SIGNATURE
Laura B. Cender	Oct. 4, 2019

CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)	MAIL CONTROL NUMBER(S)
CAVA Associates, P.C. 21-32177-01	613899

SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

A model Delegation of Authority memo has been attached to this record for your convenience and may also be located in Appendix I, "Typical Duties and Responsibilities of the Radiation Safety Officer and Sample Delegation of Authority," of NUREG 1556 Vol. 9, Rev. 3.

4. Please provide the medical license number and issuing entity (e.g. state or territory) for Anjani Rao, M.D. and Divakar Pai, M.D.

5. Please provide the following statement regarding training for individuals working in or frequenting restricted areas:

   "We have developed and will implement and maintain written procedures for a program for training required under 10 CFR 19.12 for each group of workers, including (i) topics covered, (ii) qualifications of the instructors, (iii) method of training, (iv) method for assessing the success of the training, (v) initial training, and (vi) annual refresher training."

6. Please provide a facility diagram for your Clarkston, MI office that includes the following items:
   a.) Indicate the room numbers for each area where byproduct material is prepared, used, and stored.
   b.) Indicate the direction North on the diagram.
   c.) Indicate the location of doors on the diagram, and specify which doors are access controlled (i.e. locked). Indicate if any other areas are access controlled.
   d.) Indicate all areas listed in the provided legend on the facility diagram including the package receipt area and location of radioactive waste.
   e.) If possible without losing significant image quality, please resize the diagram to be larger on the page.

7. Please provide a facility diagram for your Bloomfield Hills, MI facility that includes the following information:
   a.) Please resubmit a clearer image of the facility with legible dimensions and labeled features.
   b.) Please indicate the use of areas above and below locations where byproduct material is prepared, used, and stored.
   c.) Specify which doors and areas are access controlled (i.e. locked).

8. Please clarify your response to Item 9 Radiation Monitoring Instruments as your responses are not consistent between the information provided on page C-18 and section 8.17 of the attached Page 9. Specifically, please provide one or both of the following statements:
   a.) "Radiation monitoring instruments will be calibrated by a vendor who is licensed by the NRC or an Agreement State to perform instrument calibrations."

   and/or

   b.) "We have developed and will implement and maintain written radiation survey meter calibration procedures in accordance with the requirements in 10 CFR 20.1501 and that meet the requirements of 10 CFR 35.61."

CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)	MAIL CONTROL NUMBER(S)
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SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

9. Please provide the following statement regarding occupational dose:
   a.) "We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502."

or

   b.)"We will monitor individuals in accordance with the criteria in the section titled, 'Radiation Safety Program–Occupational Dose' in NUREG–1556, Vol. 9, Rev. 3, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Medical Use Licensees.

10. Please provide the following statement regarding material receipt and accountability:
   a.) "We will develop, implement, and maintain written procedures for licensed material accountability and control to ensure that:
      - license possession limits are not exceeded
      - licensed material in storage is secured from unauthorized access or removal
      - licensed material not in storage is maintained under constant surveillance and control
      - records of receipt (either from the licensee's own production operations or from another licensee), transfer, and disposal of licensed material, are maintained."

11. Please provide the following statement regarding safe use of unsealed licensed material:
   a.) "We have developed and will implement and maintain written procedures for safe use of unsealed byproduct material that meet the requirements of 10 CFR 20.1101 and 10 CFR 20.1201."

12. Please provide the following statement regarding waste management:
   a.) "Contact the appropriate NRC Regional Office for guidance on treatment or disposal of waste by incineration or compaction."