

From: [Lanzisera, Penny](#)
To: [Kay Kassel](#)
Subject: Request for Additional Information
Date: Friday, November 1, 2019 1:02:00 PM

Licensee: Alliance HealthCare Services, Inc.
License No. 47-25570-01
Docket No. 03035774
Mail Control No. 615397

To support your request for additional storage at your Owasso Michigan site, please provide the following additional information:

1. Provide a total possession limit for germanium-68 sealed sources to be stored.
2. Confirm that the germanium-68 sealed sources will be possessed incident to temporary storage not exceeding a defined period of time (e.g., 1 year) incident to transfer to an Alliance HealthCare Services, Inc. mobile van for use in accordance with 10 CFR Part 35 or transfer back to the manufacturer for disposal.
3. Confirm that the germanium-68 sealed sources will be inventoried and leak tested in accordance with the requirements described in 10 CFR 35.67. A license condition to document the required inventory and leak testing will be added to your license to cover sources in storage.
4. Confirm that the germanium-68 sealed sources returned from the mobile vans will be expeditiously returned (e.g., within 1 year) to the respective manufacturer or disposed of as radioactive waste to a licensed radioactive waste broker.
5. Provide a total possession limit for Sr/Rb waste stored.
6. Describe radiation detection instruments, including hand-held instruments and wipe test counters, available for use at the Owasso Michigan storage site.
7. Describe the training and experience for individuals handling germanium sealed sources and Sr/Rb waste. For instance, you may confirm that before working in the vicinity of licensed materials, personnel will have successfully completed training commensurate with assigned duties in the topics described in NUREG-1556, Volume 9, Appendix J. Alternatively, you may provide a description of the radiation safety training program, including topics covered, groups of workers, assessment of training, qualifications of instructors, and the method and frequency of refresher training.
8. As described in your letter dated October 13, 2015, the storage area will be surveyed for radiation level and removable contamination on a monthly basis. Please confirm that this survey will also apply when germanium sealed sources are stored in addition to Sr/Rb waste. In addition, please confirm if shielding is available in this area to reduce exposure rates in surrounding areas.

Please reply within 30 days with the additional information described above. If we do not receive a reply within 30 days, we will consider that you no longer require the additional use and void your request. Please reference Mail Control No. 615397 in your reply.

Thank you for your assistance,

Penny Lanzisera
Senior Health Physicist
U.S. NRC, Region I