



## CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU Ray A. Carlson, M.S.	DATE OF CONTACT 11/20/2019	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS rayacarlson@att.net	TELEPHONE NUMBER (734) 455-4730	
ORGANIZATION Zakwan Mahjoub, M.D., P.C.	DOCKET NUMBER(S) 030-39211	
LICENSE NAME AND NUMBER(S) Zakwan Mahjoub, M.D., P.C. 21-35578-01	MAIL CONTROL NUMBER(S) 616873	
SUBJECT Pending Application for a New NRC License - Additional Information Required		
SUMMARY AND ACTION REQUIRED (IF ANY) The is a summary of the conversation that occurred between Laura Cender and Ray A. Carlson on Nov. 20 2019 regarding the pending application for a new NRC license dated October 15, 2019.  Please provide your appropriately signed and dated response to the following items by no later than Friday Dec. 13, 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 Zakwan Mahjoub, M.D. and the mailing address is listed as 811 East South Blvd., Ste. 105, Rochester Hills, MI 48307. Attempts by the NRC to submit correspondence to this mailing address have been unsuccessful. Please confirm the mailing address as well as the address where licensed material will be used or stored.  2. Please submit a copy of the delegation of authority memo where Dr. Mahjoub formally accepts the role and responsibilities of the Radiation Safety Officer. The memo must be prepared in accordance with the requirements of 10 CFR Parts 35.24(b), 35.24(e), and 35.24(g).  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.		
NAME OF PERSON DOCUMENTING CONVERSATION Laura B. Cender		
SIGNATURE <i>Laura B. Cender</i>	DATE OF SIGNATURE 11/25/2019	
Rev. to 11/20/19 RAI Subm. 05/21.		

CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)

Zakwan Mahjoub, M.D., P.C.  
21-35578-01

MAIL CONTROL NUMBER(S)

616873

SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

3. As Dr. Mahjoub is applying to simultaneously be named as the RSO and AU please documentation of supervised training and experience specified in 10 CFR 35.50(d) demonstrating that the proposed RSO is qualified by training in radiation safety, regulatory issues, and emergency procedures as applicable to the types of use for which the applicant seeks approval of an individual to serve as RSO. Training must have been completed within the last 7 years per 10 CFR 35.59.
4. Please confirm that Dr. Zakwan Mahjoub, M.D. has been listed as an authorized user for 10 CFR 35.200 for Advanced Cardiology Associates, P.C. under NRC License 21-32846-01 as recently as June 2016.
5. Please provide the medical license number and issuing entity (e.g. state or territory) for Zakwan Mahjoub, M.D.
6. 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."
7. Please provide a facility diagram for your Rochester Hills, MI office that includes the following items:
  - a.) Indicate the direction North on the diagram.
  - b.) Specify which doors are access controlled (i.e. locked). Indicate if any other areas are access controlled.
  - c.) Indicate all areas listed in the provided legend on the facility diagram including the package receipt area and location of radioactive waste.
  - d.) Please indicate the use of areas above and below locations where byproduct material is prepared, used, and stored.
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)

Zakwan Mahjoub, M.D., P.C.  
21-35578-01

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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."

## Cender, Laura

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**From:** Cender, Laura  
**Sent:** Monday, November 25, 2019 10:53 AM  
**To:** rayacarlson@att.net  
**Subject:** RE: Pending new NRC license for Zakwan Mahjoub, M.D., P.C. - Control No. 616837 - Additional Information Required  
**Attachments:** Conversation Record to Zakwan Mahjoub, M.D., P.C. - Rev. Nov. 25, 2019.pdf

Hello Ray,

Thank you for reaching out to me this morning with the update regarding the mailing address for Zakwan Mahjoub, M.D., P.C. I understand that a new mailing address will be provided within the next few days that we may use while the facility remains under construction.

I have also attached a revised copy of our conversation record with the correct dates and license classification listed. Please let me know if you have any additional questions as you review the record.

During our call today we also discussed possible dates for the pre-licensing site visit. I would be available to perform the site visit any day during the week of January 6<sup>th</sup>. Alternatively, if we are unable to schedule a date during the week of January 6<sup>th</sup> I would also be able to perform the site visit during the week between Christmas and New Year's. Also, as we discussed this morning I am the reviewer for Advanced Heart & Vascular Care and a site visit will also be required for this applicant. If possible, I would like to arrange for the site visits to be either the same day or have the second visit scheduled for the following day after the first to allow for easier travel arrangements. The applicants can expect the pre-licensing site visit to last for roughly one hour.

Please let me know if you have any questions.

Thank you,  
Laura

Laura Cender  
U.S. Nuclear Regulatory Commission  
Materials Licensing Branch  
E-mail: Laura.Cender@nrc.gov  
Phone: (630) 829-9712

**From:** Cender, Laura  
**Sent:** Wednesday, November 20, 2019 9:20 AM  
**To:** rayacarlson@att.net  
**Subject:** Pending new NRC license for Zakwan Mahjoub, M.D., P.C. - Control No. 616837 - Additional Information Required

Hello Ray,

Thank you for taking time out of your morning to discuss the pending new license application for Zakwan Mahjoub, M.D., P.C. As we discussed this morning, I have attached a copy of our conversation record as well as a model Delegation of Authority memo for your convenience.

During our conversation we also discussed that you may temporarily request to be listed on the license as the RSO. If this is the decision that is made with Dr. Mahjoub, in addition to the delegation of authority please also address the following items:

- identify other commitments you have for NRC or agreement state licensed facilities, a description of how you will allocate time to permit the performance of the duties of the RSO, including your minimum amount of time that will be spent onsite;
- Identify the onsite representative who will serve as point of contact during your absence;
- Describe your overall availability to respond to questions or operational concerns; and
- Specify the usual maximum amount of time that it would take to arrive at the facility in the case of an emergency.

Additionally, as we discussed, a new revision of NUREG 1556 Vol. 9 (rev. 3) was issued in September, 2019. Please ensure future correspondence with the NRC is prepared in accordance with this revision of the NUREG. You may access the NUREG at the following link: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v9/>. The new licensing checklists may be identified on pages 170-201.

Please consider dates that both yourself and Dr. Mahjoub will be available for the pre-licensing site visit. I understand that the facility is currently under construction. We can perform pre-licensing site visits while the facility is still under construction, but it would be preferential to visit the site when it is closer to the final end state.

Please submit your response to the requested items by no later than Friday Dec. 13, 2019. Please ensure that your response is dated and signed by Dr. Mahjoub.

Please feel free to contact me at 630-829-9712 or send me an email if you have any questions.

Thank you,  
Laura Cender

Laura Cender  
U.S. Nuclear Regulatory Commission  
Materials Licensing Branch  
E-mail: [Laura.Cender@nrc.gov](mailto:Laura.Cender@nrc.gov)  
Phone: (630) 829-9712