

1. This verbiage is a restatement of Appendix T: Model Procedures for Safe Use of Unsealed Licensed Material in NUREG-1556 Volume 9.
2. This verbiage is part of the training requirements for imaging and localization studies found in COMAR 26.12.01.01 Section G.290 (c)(ii)(g). In addition, manufacturers of generators and/or reagent kits are required to provide procedures to be followed and equipment or shielding to be used while eluting the generators or processing radioactive material with the reagent kits in accordance with COMAR 26.12.01.01 Section C.28(k)(5).
3. Per COMAR 26.12.01.01 Section G.204(b), the licensee must measure the Molybdenum-99 contamination breakthrough. In addition, in accordance with G.27(b)(2), the licensee is required to ensure that all supervised individuals follow the written radiation protection procedures established by the licensee for medical use. In order to ensure patient safety and quality control, the Department requires that the licensee establish written procedures for performing such tests.
4. In accordance with COMAR 26.12.01.01 Section C.31(b), transfer of control of a license is prohibited until full and adequate information is submitted, reviewed, and approved by the Agency. In addition, NUREG-1556 Vol. 9, Rev. 3 Section 9.2 states that the licensee must provide timely notification of transfer of control. In COMAR 26.12.01.01 Section C.32, the licensee is required to provide thirty days notice prior to expiration, termination and decommissioning. To be consistent, the Department requires a thirty-day advance notice to allow for timely review and processing of transfers of control.
5. In order to be in compliance with NRC new license inspections, the Department wants to require a 10-day notification of receipt of radioactive materials. This permits the Department's inspection program to put each new licensee on the correct inspection schedule.
6. The Department is asking for this condition to be vetted by the NRC due to source change-out. The sources are manufactured at the maximum permissible activity. For a short period of time, the licensee is in possession of the new source at its maximum activity and its depleted source until it is shipped back to the manufacturer.