

From: [Hann, Patrick-John](#)
To: [Rusty Beeler](#)
Cc: [Philip Birt](#)
Subject: Request for Additional Information
Date: Tuesday, August 10, 2021 2:04:00 PM
Attachments: [RAI #2.pdf](#)

License No. 24-05245-01

Docket No. 03002332

Mail Control No. 624953

Mr. Beeler,

Please find attached the request for additional information regarding your license renewal application February 8, 2021, March 24, 2021, July 15 2021, and July, 26, 2021. If you could please review, confirm, and clarify these items by August 17, 2021, it would be greatly appreciated. Should you have any questions, please don't hesitate to reach out.

Patrick-John E. Hann, MHP
Health Physicist
U.S. Nuclear Regulatory Commission

1. In your response dated July 26, 2021, you specified that you will identify an in-house representative who will serve as a point of contact during the RSO's absence and specify the maximum amount of time it will take a consultant RSO to arrive at the facility in the event of an emergency that requires their presence. Please confirm whether you will be using a consultant RSO.
2. In your response dated July 26, 2021, you specified a possession limit of "As Needed" for any byproduct material listed under 10 CFR 31.11 when the activity exceeds the quantity listed in 10 CFR 31.11. We do not allow this type of use to have a possession limit of "As Needed". Your current license has a possession limit of 3mCi. Please confirm that a 3mCi possession limit is adequate.
3. In your response dated July 26, 2021, you didn't indicate whether Jonas Singer, M.D., who is currently listed on your license, is to remain as an Authorized User. Please confirm whether Jonas Singer is to be on the license for uses permitted by 10 CFR 35.100 and 35.200.
4. In your response dated July 26, 2021, you indicated that you have submitted a description of the training and experience demonstrating that the proposed employee is qualified by training and experience for the use requested, a copy of the manufacturer's training certification and an outline of the training in procedures to be followed, and a written commitment from the licensee that the trained employee will follow manufacturer procedures in regards to the Installation, Maintenance, Adjustment, Repair, and Inspection of Therapy Devices Containing Sealed Sources. Please confirm that you do not possess or intend to possess any therapy device containing sealed sources.