From: Ronald Frick
To: Simmons, Michelle
Subject: [External_Sender] Re: Maui Memorial Medical Center Renewal: Additional Information Needed
Date: Thursday, January 06, 2022 6:58:45 PM
Attachments: mmh_rai_response.pdf

Re: mail control number 628195

Dear Ms. Simmons,

I have modified the relevant pages from the license renewal application to include the other commitments listed in your email. See attached. Please let me know if you need anything else.
Thank you,
Ron Frick

From: Simmons, Michelle <Michelle.Simmons@nrc.gov>
Sent: Thursday, January 6, 2022 10:50 AM
To: Ronald Frick <rfrick@gammamedphys.com>
Subject: Maui Memorial Medical Center Renewal: Additional Information Needed

Mr. Frick,

We have reviewed your application dated July 28, 2021 requesting to renew your license. Before we can take further action, we will need the following additional information.

1. Please commit to the following statement to the following statements:
    - Contact the appropriate NRC Regional Office for guidance on treatment or disposal of waste by incineration or compaction.
    - For measurement of alpha emitters where gamma or beta emissions are not measurable in a traditional dose calibrator, identify specialized measurement equipment and the nationally recognized standard used to calibrate the instrument or provide a copy of the manufacturer's instructions to calibrate the instrument.
    - Radiation monitoring instruments will be calibrated by a vendor who is licensed by the NRC or an Agreement State to perform instrument calibrations.

2. Please provide the following:
    - A description of the equipment used to measure the dosages.

To continue review of your application, we request that you submit your response to this letter by January 12, 2022. In your response, please refer to the mail control number 628195. We will assume that you do not wish to further pursue this licensing action if we do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, we encourage you to contact us at Michelle.Simmons@nrc.gov.

Thank you for your cooperation.

Michelle R. Simmons
(Pronouns: she, her, hers)
Senior Health Physicist
Nuclear Regulatory Commission
Materials Licensing and Decommissioning Branch
Region IV
1600 East Lamar Blvd.
Arlington, Texas 76011
817-200-1590

Item 8: 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 of assessing the success of the training, (v) initial training, and (vi) annual refresher training.

Item 9: Facilities and Equipment

Annotated drawings of the rooms and adjacent areas where byproduct material will be used and stored are appended as ATT 9.1.

Item 9: Radiation Monitoring Instruments

Radiation monitoring instruments will be calibrated by a vendor who is licensed by the NRC or an Agreement State to perform instrument calibrations.

The following instrumentation will be available:

- Portable GM survey meters (3), range 0.1 to 1,000 mR/hr
- NaI well counter and NaI uptake probe with multi-channel analyzer
- Electronic dosimeter

We reserve the right to upgrade our survey instruments as necessary as long as they are adequate to measure the type and level of radiation for which they are used.

Item 9: Dose calibrator and other equipment used to measure dosages of unsealed byproduct material.

Equipment used to measure dosages will be calibrated in accordance with nationally recognized standards or the manufacturer's instructions.

We currently use the Biodex Atomlab 500 dose calibrator.

We currently do not measure any alpha emitters where gamma or beta emissions are not measurable in a traditional dose calibrator.

Item 9: Manual Brachytherapy Sources and Sealed Sources in Therapy Unit - Calibration and Use - N/A

Item 9: Other Equipment and Facilities

A description of the additional facilities and equipment for radiopharmaceutical therapy is appended as ATT 9.4.

Item 10: Occupational Dose

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.'

Item 10: Spill/Contamination Procedures

We have developed and will implement and maintain written procedures for safe response to spills of licensed material in accordance with 10 CFR 20.1101.

Item 10: Emergency Procedures for Therapy Devices Containing Sealed Sources - N/A

Item 10: Installation, Maintenance, Adjustment, Repair, and Inspection of Therapy Devices Containing Sealed Sources - N/A

Item 10: Material Receipt and Accountability

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.

Item 10: Leak Tests

Leak test sample collection and analysis will be performed by an organization authorized by the NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits or sample analysis services to other licensees and according to the instructions provided in the leak test sample collection kit.

Item 10: Area Surveys

We have developed and will implement and maintain written procedures for area surveys, in accordance with 10 CFR 20.1101, that meet the requirements of 10 CFR 20.1501 and 10 CFR 35.70.

Item 10: Safe Use of Unsealed Licensed Material

We have developed and will implement and maintain procedures for safe use of unsealed byproduct material that meet the requirements of 10 CFR 20.1101 and 10 CFR 20.1201

Item 10: Mobile Medical Service - N/A

Item 11: Waste Management

We have developed and will implement and maintain written waste disposal procedures for licensed material in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of Subpart K to 10 CFR Part 20 and 10 CFR 35.92.

We currently have no plans for waste disposal or treatment using incineration or compaction. If those methods are needed in the future, we will contact the NRC Region IV office for guidance.