

From: [Nguyen, Jan](#)
To: [Wen, Carol](#)
Cc: [Bowers, Timothy](#)
Subject: NRC Request for Additional Information for Christiana Care Health System
Date: Tuesday, March 15, 2022 8:44:00 AM

Licensee: Christiana Care Health System
License No.: 07-12153-02
Docket No.: 030-01303
Mail Control No.: 629941

PLEASE REPLY TO THIS EMAIL TO CONFIRM RECEIPT

Dear Ms. Wen:

This is in reference to your letter dated January 26, 2022, requesting exemptions for the annual training requirements described in 10 CFR 35.310(a), 10 CFR 35.410(a), and 10 CFR 30.34 (Annual Radiation Safety Training License Condition). In order to continue our review, please provide the following additional information:

1. Please indicate if this exemption request is only for healthcare providers, nursing staff, and/or ancillary staff caring for in-house therapy patients treated with material permitted by 10 CFR 35.300 or 35.400 and are not releasable under 10 CFR 35.75. If this is correct, please indicate the approximate number of staff that would be affected, and provide an estimated number of estimated patients treated with 10 CFR 35.300 and 35.400 materials in a month.
2. Please confirm that the exemption is only for annual refresher training, and that new employees will still be required to complete their assigned radiation safety module(s) during onboarding and prior to assuming their duties.
3. Please confirm that you will administer radiation safety training to any staff whenever there is a significant change in duties, regulations, terms of the license, or type of radioactive material or therapy device used.
4. Please provide a copy of your radiation safety training procedures. The procedures should indicate what groups receive radiation safety training and on what frequency.
5. Please confirm that you are not requesting an exemption for training required under 10 CFR 35.610.
6. It is our understanding that staff receive their annual radiation safety training through an online learning system. Please indicate if all staff are required to receive radiation safety training or only those staff who work in the vicinity of radioactive material, radioactive/radiation devices, and/or patients treated with radioactive material. If all staff are required to receive some sort of radiation safety training component, please indicate the estimated percentage of staff that would actually be required to have the radiation safety training.

7. We have been authorized to approve exemption requests of up to 90 days. If you require additional time, please indicate how you will determine the on-going need; such as evaluating the level of COVID in the community, exceeding a given percentage of COVID patients at your facility, exceeding a given percentage of staff absent due to COVID, etc. Provide a commitment that once these levels have subsided you will return to the established training requirements and document when this occurred.

In order to continue prompt review of your request, we request that you submit your response to this email within 30 calendar days from the date of this email and reference mail control number 629941.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding medical uses of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/med-use-toolkit.html>. This site also provides the updated Training and Experience NRC Form 313A series of forms and guidance, as well as information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me via electronic mail at janice.nguyen@nrc.gov or via telephone at (610) 337-5006.

Thank you for your cooperation.

Jan

Janice Nguyen
Senior Health Physicist
Division of Radiological Safety and Security (DRSS)
Medical and Licensing Assistance Branch (MLAB)
U.S. Nuclear Regulatory Commission Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406
Office (610) 337-5006
FAX (610) 337-5269

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