Hartford HealthCare Medical Group

November 17, 2022

To: Medical and Licensing Assistance Branch (MLAB)
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road, Suite 102
King of Prussia, PA 19406-1415

From: Hartford HealthCare Medical Group
1290 Silas Deane Highway
Wethersfield, CT 06109
RAM License No. 06-23559-01

Subject: Hartford HealthCare Medical Group's response to the NRC request for additional information, Mail Control No. 631716, RAM License No. 06-23559-01

Dear Ms. Ahmed,

This is in response to the letter we received November 17, 2022, requesting more information on our NRC License No. 06-23559-01 renewal. Please find our responses to your requests below:

1. *On your response letter dated October 6, 2022, you requested to remove Dr. Subramanian Krishnan and Dr. Manju John from your license as authorized users; however, on Attachment 2 of your response, you requested no changes to authorized users at this time. Please clarify if you would like to keep the listed physicians as authorized users on your license or if you would like them removed. Please note that if you are removing them due to their credentials as MBBS, they can be kept on the license with an exemption without need of credential change or documentation to support credential change.*

Response: We would like to leave Dr. Krishnan and Dr. John as authorized users with an exemption without need of credential change or documentation to support credential change.

2. *On your original application, you indicated that the hot lab has a lock and key at two of your locations. Please further clarify security, access, and storage to hot lab keys.*

Response: The hot labs at both of these facilities are kept locked at all times when not in use. The technologist at each site knows the location of the key if someone needs to gain entry to the hot lab. The key is stored in a location near by the hot lab.

3. *In your response on Attachment 2, for Item 8.9.2: Radiation Monitoring Instruments you stated:*

   "Radiation monitoring instruments will be calibrated by a person (entity) qualified to perform meter calibrations."

   This statement varies from the verbiage in NUREG-1556, Vol. 9 Rev. 3. Please confirm one of the following statements as described in the NUREG-1556 Vol. 9 Rev. 3.

   a. *A statement that: "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. *A statement that: "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 in 10 CFR 35.61."*

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

4. *Section 8.10.11 of NUREG-1556, Vol. 9 Rev. 3 provides information on Leak Tests. Submission of leak test procedures is only required for sources not used for licensed medical activities. You are only required to pick one of the statements below. In your response on Attachment 2, you have committed to the statement in 4a but also committed to 4b. and 4c. Please confirm one of the statements and provide documentation if needed:*

   a. *A statement that: "We have developed and will implement and maintain written procedures for sealed-source leak testing that meet the requirements of 10 CFR 35.67."*

Response: We have developed and will implement and maintain written procedures for sealed-source leak testing that meet the requirements of 10 CFR 35.67.

If you have any questions, please do not hesitate to contact Hartford Healthcare Radiation Safety Officer Joseph J. Corning, MD, FACC, FACP at Joseph.Corning@hhchealth.org.

Thank you,

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