

**Delaware Cardiology LLC  
2101 Foulk Road  
Wilmington, DE 19810**

August 10, 2009

L-4  
MS-16

Farrah C. Gaskins, Health Physicist  
Licensing Assistance Section  
Nuclear Medicine Safety Branch  
Division of Radiation Safety and Safeguards  
U.S. Nuclear Regulatory Commission, Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

RE: Renewal Application Response Letter - Delaware Cardiology, LLC  
License Number: 07-30527-01  
Docket Number: 03035166  
Control Number: 143894

Dear Ms. Gaskins:

Pursuant to your correspondence dated July 30, 2009 and conversations with Michael W. Lairmore, M.S., our health physicist, the following responses are provided in support of our pending renewal application. Each response will numerically correspond to the questions addressed in your letter.

1. We confirm that we will develop, implement and maintain written procedures for safe response to spills of licensed material in accordance with 10 CFR Part 20.1101. In our renewal application, we committed to utilize the policy and procedure outlined in Nuclear Regulatory Guide 1556, Volume #9, Revision 2, Appendix N entitled; "Model Emergency Procedures". Please refer to our renewal application to reference this commitment.
2. Within our renewal application, the section describing "Patient Dose Records", confirmed that we would implemented the model procedure outlined in Nuclear Regulatory Guide 10.8, Revision 2, Appendix M; "Records of Unit Dose Use" and "Records of Multidose Vial Use". This section of the renewal application has been deleted. The depleted section is highlighted below:

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**Item 10.8****RECORDS OF UNIT DOSE USE:**

**We will establish and implement the model procedure outlined in Regulatory Guide 10.8, Revision 2, Appendix M. for Unit Dosage Record System.**

**Item 10.9****RECORDS OF MULTIDOSE VIAL USE:**

**We will establish and implement the model procedure outlined within Regulatory Guide 10.8, Revision 2, Appendix M for a Multi Dose Vial Record System.**

The corrected page of the renewal application, has been enclosed within Attachment A. Please refer to this section for details.

All remaining policy and procedures outlined in our renewal application, have committed to the policies and procedures outlined in the Appendix Section of Nuclear Regulatory Guide 1556, Volume #9, Revision 2. Please refer to our renewal application, to reference these commitments.

If you require additional information, please contact Michael W. Lairmore or myself. Mr. Lairmore may be reached at (201) 693-2277.

We thank you in advance for assistance with this pending licensing action.

Sincerely,

A. Neal DeSanctis, Jr., M.D.  
President

**Attachment A**

**Item 10.9****RECORDS OF MULTIDOSE VIAL USE:**

We will establish and implement the model procedure outlined within Regulatory Guide 10.8, Revision 2, Appendix M for a Multi Dose Vial Record System

**Item 10.12****PROCEDURE FOR AREA SURVEY:**

We will establish and implement the model procedure outlined in Nuclear Regulatory Guide 1556, Volume #9, Revision 2, **Appendix R** entitled; **"Model Procedures for Area Surveys"**

Action trigger limits for ambient exposure and removable contamination will be as follows:

**Restricted Areas:**

Ambient exposure = 5.0 mR/hr

**Removable Contamination:**

2,000 dpm/100 cm<sup>2</sup> (gamma emitters)

**Unrestricted Areas:**

Ambient exposure = 0.05 mR/hr

**Removable Contamination:**

200 dpm/100 cm<sup>2</sup>

**Item 11****PROCEDURE FOR WASTE DISPOSAL:**

We will establish and implement the model procedure outlined in Nuclear Regulatory Guide 1556, Volume #9, Revision 2, **Appendix W** entitled; **"Model Procedures for Waste Disposal by Decay-In-Storage"**

**Additional Confirmation:**

1. We do not intend to use I-131 at this facility. Therefore, a Written Directive Program will not be implemented at this institution. Please allow this statement to serve as our "Negative Declaration".
2. In conjunction with the new licensing guide, we will continue to follow regulations addressed in 10 CFR Parts 19, 20, 21, 30, and 35.