Region I Office
Division of Nuclear Materials Safety
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Telephone Conversation Record

Date:10/27/2014 (1:30- 2:35 PM)
License No.: 45-30957-01
Docket No.*(no hyphens)*: 03036666
Mail Control/Report No.:585130
Licensee Name: Varian Medical Systems
Participant(s) Name/Title: Richard Piccolo, RSO
Work Telephone No.:434-951-8675
NRC Representative Name/Title: Kathy Dolce Modes, Sr. Health Physicist

Subject: Request for Additional Information for renewal application
(This is the title that will be used in ADAMS)

Discussion: We talked about the following:

1. Box 3 on NRC Form 313 was left blank. Please indicate that use of licensed material will take place at customer's facilities.
2. In Section 5 of your application, you discuss Ir-192, but not Yb-169. Please confirm that you wish to remove Yttbium-169 from your license.
3. In Section 5.1.2 of your application dated October 14, 2014, you indicated that the sealed sources are manufactured by Alpha Omega Services Incorporated, NTP(Europe) S.A. (Belgium) and Mallinckrodt Medical BV (The Netherlands). In reviewing SSDR CA-1080-S-102-S, all three manufacturers were listed. However, in reviewing CA-1080-S-104-S, NTP Radioisotopes was missing and MDS Nordion was listed. Please provide the most current (up-to-date) first page of the two source SSDRs.
4. Confirm removal of GammaMed 212 source.
5. Confirm that you wish to remove dismantling, alignment, instrument calibration, leak testing and transportation from the list of services on Item 9 of your license.
6. Confirm that you wish to add source retrieval, packaging, and training and instruction. For source retrievals, please provide your emergency procedure for this activity. In addition, you requested to add other services, but did not specify. Please specify the other services that your field service engineers may perform at your customer's facilities with the licensed sealed sources.
7. The license allows you to list AUs by name. Any backup for the RSO? If so, provide radiation safety training and experience. No PII.
8. Please remember to train all personnel who use licensed material; note that others may be involved for source retrieval operations.

9. Section 8.1 is a short list. The training slides in the attachments are much more detailed. You can commit to following Appendix H and not provide the training slides or the short description. The short description does not include a review of the O&E procedures or OTJ or the hands on use of a survey meter.
10. Section 10.0.1 ALARA indicates that all source exchanges are controlled at the HDR control console outside of the shielded treatment room, but this is only for routine source exchanges.
11. In Section 8.0 you refer to Varian Medical Systems' Field Service Engineers, but in Section 10.0.1 you refer to Varian Medical Systems service personnel. Does the latter include the RSO and the Ops Mgr? Please define and make sure all personnel who may handle licensed material are trained appropriately.
12. Attachment 7 – radiological emergency callout does not address a stuck source as included in your list of emergencies on your training slides (e.g., ruptured source, stuck sources, unexpected high radiation readings, any unusually event affecting the source, the risk of a stuck source, suspicion that source capsule is broken or compromised). Section 16.0 in Attachment 8 does not specify if the FSE can try to dislodge the source or use the emergency hand crank before calling the RSO. What to do in case of a natural disaster?
13. Attachments 5 and 7 indicate that the document contains confidential proprietary information. Follow 10 CFR 2.390 or do not provide.
14. Attachment 8 - Radiation Safety Program differs from the first 15 pages of your application. Please combine and then you can remove Attachment 8.
15. We do not need Attachments 1, 3, 4, 5, 6, and 7 for the renewal. Attachment 8 can be combined with submittal.
16. Include the organization for the FSEs in Attachment 2.
17. Please confirm that the Tech Tip is no longer needed and can be removed from the tie down (last license condition).

Action Required:

Call licensee back on November 12, 2014 to review response over the phone prior to resubmittal.

SUNSI REVIEW

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SUNSI Review Completed by: K MODES

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