



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

February 24, 2005

Docket No. 03012998
Control No. 136063

License No. 37-07438-15

Leonard M. Stephenson
Vice Provost for Research and Dean of Grad Studies
Philadelphia Health and Education Corporation
d/b/a Drexel University College of Medicine
245 North 15th Street
Philadelphia, PA 19104

SUBJECT: PHILADELPHIA HEALTH AND EDUCATION CORPORATION, REQUEST FOR
ADDITIONAL INFORMATION CONCERNING APPLICATION FOR RENEWAL
OF LICENSE, CONTROL NO. 136063

Dear Mr. Stephenson:

This is in reference to your application dated November 23, 2004 requesting to renew Nuclear Regulatory Commission License No. 37-07438-15. In order to continue our review, we need the following additional information:

1. Item 5 of the application indicates that Iodine-129 is covered in Item 5.ii. Your current license allows for the possession of 500 microcuries of Iodine-129. Please confirm that you do not possess more than 50 microcuries of Iodine-129.
2. Item 5.ii.c requests that your license be written in a manner so that you administratively control the "R-value" of this line item so that it does not exceed a value of 100. Current licensing policy does not permit this approach. Your financial assurance obligations are determined by what the license authorizes and item 5.ii would result in an "R-value" exceeding 10,000 and would require a financial assurance mechanism of \$1,125,000. Please revise your request in item 5 (See also deficiency 4) to lower your authorization for licensed materials or confirm that you shall submit a financial assurance mechanism for \$1,125,000.
3. You state in your application that the Strontium-90 and Nickel-63 sealed sources were dispositioned. Please provide copies of the most current leak test records for these sources and documentation from the recipient(s) indicating that the sealed sources are now in their possession.
4. Under Item 5, "Decommissioning Fund", you state that you reserve the right to reduce the line of credit to \$225,000 based on an "R-value" between 1,000 and 10,000. Since your license allowed for the possession of licensed material in quantities requiring a financial mechanism of \$900,000, you must (1) show that licensed facilities that are in use or that are not in use but are contaminated will only require the smaller financial mechanism **and** (2) your possession limits must be lowered so that the "R-value" does not exceed 10,000.

5. The first table on page 6 of your application describes the frequency at which surveys will be performed but does not describe what isotopes fall in which group. Please provide a list of example isotopes that comprise each group as you have done in the second table on page 6.
6. Your application contains a delegation of authority on page 8. The delegation of authority is supposed to be a stand-alone document within the application signed by a senior management representative. Appendix J of NUREG-1556, Volume 11 contains a model Delegation of Authority that is acceptable to the NRC (Enclosed).
7. Under Item 8, "Training for Individuals Working In Or Frequenting Restricted Areas", page 10, you state that refresher training will be offered as needed and at least annually. Confirm that refresher training will be attended by personnel requiring the training on, at least, an annual basis.
8. Also, under Item 8, you state that training will be provided by Radiation Safety Office staff. Please provide a description of the minimum qualifications for instructors who provide radiation safety training.
9. Under Item 10.6, "Surveys", you state, in part, that each source will be individually tested if the activity on the swab exceeds 0.05 microcuries. Please confirm that the limit should be 0.005 microcuries.

Current NRC regulations and guidance are available at the NRC Web sites listed below or by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 9:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 136063. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5075.

L. Stephenson
Philadelphia Health and Education Corporation

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In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Sincerely,

Original signed by Steven Courtemanche

Steven Courtemanche
Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

Enclosure:
Appendix J of NUREG-1556, Volume 11,

NRC Web site addresses
NRC regulations

<http://www.nrc.gov/reading-rm/doc-collections/cfr/>

Licensing guidance

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>

General Policy and Procedure for NRC Enforcement Actions

[Http://www.nrc.gov/what-we-do/regulatory/enforcement/enforc-pol.pdf](http://www.nrc.gov/what-we-do/regulatory/enforcement/enforc-pol.pdf)

206 of the Energy Reorganization Act of 1974

<http://www.nrc.gov/who-we-are/governing-laws.html>

cc:
Kent Lambert, Radiation Safety Officer

DOCUMENT NAME: E:\Filenet\ML050580003.wpd

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