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**Administrative Office**

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**May 20, 2005**

**Sandy Gabriel  
Senior Health Physicist  
Medical Branch  
U.S. Nuclear Regulatory Commission, Region I  
475 Allendale Road  
King of Prussia, Pennsylvania 19406-1415**

**Re: License: 37-30436-01  
Docket: 03034669  
Mail Control: 136990**

**Dear Ms. Gabriel:**

**This is in response to your e-mail of May 19, 2005 regarding our application for amendment to add High Dose Rate Afterloading to license 37-30436-01. We will address each of your items of concern as referenced in you e-mail.**

**Item 1. Please confirm that authorized users, authorized medical physicists, and operators will participate in annual drills of emergency procedures, as required by 10 CFR 35.610(e).**

**All authorized users, medical physicist and operators of the HDR unit will participate in drills of the emergency procedures on an annual basis in compliance with 10 CFR 35.610 (e).**

**Item 2. Item 9.4B of your application addressed spot checks.**

- a) Please confirm that daily spot checks will meet the requirement of 35.643(a)(2) to assure proper operation of source exposure indicator lights on the remote after loader unit, on the control console, and in the facility.**

**Item 2. Spot checks (Continued)****b) Specify the method you will use to check proper operation of radiation area monitors.**

Our daily spot check procedures will comply with all of the requirements of 10 CFR 35.643 including verification of the proper functioning of the source indicator on the HDR unit, control console and above the door.

We will verify the proper operation of the radiation area monitors utilizing a Cs-137 check source during the daily check procedure. In addition, the proper operation of the monitors will be confirmed during the treatment procedure.

**Item 3. Please note the requirement of 35.633(b)(3) to check source retraction with the backup battery upon power failure.**

The source retraction with battery backup upon power failure will be verified as part of the full calibration procedure during source exchanges and monthly calibration checks.

**Item 4. Item 9.5B of your application stated that a simulator unit will be located in the same room as the HDR unit and that administrative controls will be used to prevent simultaneous operation of the two units.**

**a) When this room is unlocked for simulator use, what is the method to secure the HDR unit? For example, will it be locked in a closet or cabinet, or secured by a cable that is locked in place?**

**b) Have you considered engineering controls rather than administrative controls to prevent simultaneous operation of the two units? If so, why were these rejected? Describe the administrative controls and your procedure to assure they are effective.**

The HDR unit will be secured in a locked cabinet within the HDR vault when the unit is not being utilized for patients, service or physics testing.

Instead of administrative controls, the door interlocks for the HDR unit and simulator will be interlocked to allow only one unit to be operational at any time.

**Item 5. ) Item 9.5C of your application stated that if the area monitor(s) are not operable, individuals will use a portable survey instrument to enter the room following use of the afterloader. Your statement is acceptable only for malfunctions that occur after successful completion of the daily spot check.**

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**Item 5. Area Monitors (continued)**

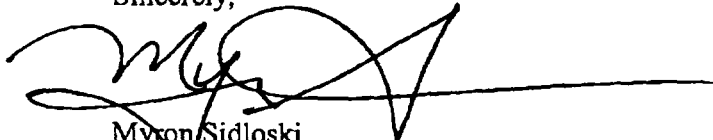
We are confirming that at least one of the two area monitors must pass the daily spot checks in order for HDR operations to be initiated. The procedure described in item 9.5B applies only to failures occurring during a patient treatment.

**Item 6.** Appendix III of your application included emergency procedures. Please confirm that these procedures will be located at the HDR unit console and that names/telephone numbers of the authorized user, authorized medical physicist, and RSO will be posted at the console, as required by 35.610(b-c).

We will comply with the provisions of CFR 35.610. The emergency procedures will be posted at the control console. The names and telephone numbers of the authorized user(s), authorized medical physicist(s) and Radiation Safety Officer will be posted at the console.

If you have any questions regarding this response or require additional information, please contact our physicist, Adrian W. Gooch, Jr., at 570-558-7403. The completed license amendment can be faxed to 570-558-7407. We appreciate your assistance with this amendment request.

Sincerely,



Myron Sidloski  
Chief Administrative Officer