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18 May 2005

Michelle Simmons, Health Physicist  
Medical Branch, Division of Nuclear Materials Safety  
U.S. Nuclear Regulatory Commission, Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

**Re: Renewal of USNRC License # 45-23057-01 Norton Community Hospital**  
**Docket No.: 03020223**  
**Control No.: 136360**

Ms. Simmons,

As per your e-mail request of 16 May 2005 and our telephone conversation of 18 May 2005 I am responding to your request for further information regarding the renewal of Norton Community Hospital's (NCH) USNRC Byproduct Materials License. My numbered responses will follow your numbered questions.

1. As shown on the floor plan submitted with the renewal application, Norton Community Hospital is a single story structure with no occupancy above or below the hot lab or scan rooms. Also, as shown on the submitted floor plan, there are unrestricted corridors on both exterior walls of the hot lab. Please note the hot lab walls are lined with 1/16" lead sheeting to a height of 7 feet to further reduce the radiation exposure to the public.
2. The bathroom adjoining the hot lab is only used for "nuclear" patients. Under conditions where patients have not used the restroom (weekend, etc.) the exposure rate from the hot lab is indistinguishable from background radiation. Furthermore, on my last visit to Norton I surveyed the corridors adjoining the hot lab and patient restroom and found the radiation levels to be indistinguishable from background.
3. The instruments for surveys are as follows:
  - a. **Wipe Tests for Removable Contamination:** Capintec CRC-15W® Dose calibrator with attached 2" NaI(Tl) well counter. On my last quarterly inspection I found the minimum detectable activity to be much less than 0.005 uCi.
  - b. **Area Surveys for Ambient Radiation:** Ludlum Model 14-C GM survey meter with a thin end window Geiger-Muller detector. This meter is calibrated annually according to published standards.

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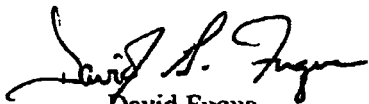
Norton Community Hospital USNRC License #45-23057-01  
Request for Further Information


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NMSS/RGNI MATERIALS-002

4. When approached by Norton Community Hospital regarding the move of the nuclear medicine department I recommended that they should coincide the move with the renewal of their license. As per 10 CFR 35.13(e) a licensee may change locations of use where only materials listed for use under 10 CFR 35.100 and 200 are used. The scope of NCH's radioactive materials use program is encompassed within the confines of 35.100 and 200. As such, they are limited to non-therapeutic procedures with materials that have half lives typically of less than 1 day ( $^{99m}\text{Tc}$ , et cetera). Furthermore, the only radioactive sources NCH possesses with half-lives of greater than 120 days are sealed sources for instrument calibration (10 CFR 35.65) and as such require no decommissioning provided all required leak tests were performed and satisfactory results returned. For the aforementioned reasons I chose six representative locations in the nuclear medicine department, when all material was removed, to survey and wipe for radiation and removable contamination. I feel these six areas represent the locations where this contamination would be found, if it existed. Also, since the department was opened these same areas and more have been surveyed and wiped daily and weekly respectively. For these reasons I feel closeout survey results submitted with the renewal package are more than adequate to show there is no threat to public health from radiation or residual contamination. However, if this explanation of my motives behind the original decommissioning survey is not sufficient, I would be more than happy to return to NCH and perform/submit surveys on as many locations as the Commission may deem necessary for resolution of this issue.

If you have any further questions regarding this matter or would like to discuss it further do not hesitate to contact me. My office number is (540) 563-0165 and my cell number is (540) 353-2597.

Sincerely,

  
David Fuqua  
Chief Executive Officer  
Norton Community Hospital

  
James P. Nunh  
Senior Physicist  
Physics Associates