



March 2, 2006

P-7

Mr. Thomas Thompson
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Amendment of License 06-30764-01
(Current Amendment No. 9) Docket No. 03036099

Dear Mr. Thompson

Advanced Care Medical is requesting that the referenced possession -storage packaging license be changed as follows

Item 6 : Add D. **Cesium 131**

Item 7: Add D. **Sealed Sources as specified in Condition 11**

Item 8: Add D. **130 curies total**

Item 11: Add

<u>Isotope</u>	<u>Source/Model #</u>	<u>Max Activity per Source</u>
CS-131	CSERION CS-1	65 mci internal activity

We have entered into an agreement with IsoRay, Richmond WA to utilize their sealed sources in our loose and stranded load configurations.

We are presently taking steps to implement ALARA principles and are increasing shielding in both our operational areas and in our final packaging. We have:

1. Designated three work stations and an Assay Station for extra shielding to process CS-131 sealed sources (See attached Room Layout for location)

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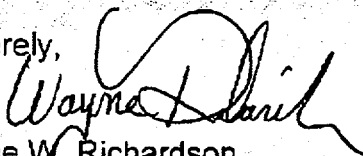
2. Provided each of these work stations (tables) with additional lead shielding (2X the current thickness) underneath each table.
3. Provided each of these work stations with steel partitions at the front and sides of each work station.
4. Provided longer forceps/tools used for handling CS-131 seeds.
6. Established a policy of "operator rotation" when handling CS-131 sealed sources.
7. Relocated (8) operators who were stationed in the "restricted area" to another area in the facility. Although these operators wore dosimetry they did not work with radioactive material.
8. Ordered one additional area monitor to complement the six we are presently utilizing. The new monitor will be placed on a wall opposite the CS-131 work stations.
9. We anticipate that during 2006 CS-131 may represent 5 to 10% of our total case volume.

I am providing copies of the 510 (K) Summary, provided by IsoRay (confirming the decision of the FDA to allow IsoRay to market their device) and the Sealed Source Device Safety Evaluation for their CS-1 sealed source. Attached is a copy of the current restricted area with projected locations for the four stations that will be utilizing CS-131.

IsoRay has been providing this device to hospitals for brachytherapy implants since October 2004.

Please contact me if you have any questions about this amendment request.

Sincerely,



Wayne W. Richardson
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