



OSI Oncology Services INTERNATIONAL

Equipment Division:

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August 4, 2006

John D. Kinneman
US Nuclear Regulatory Commission
Region 1 Office
475 Allendale Road
King of Prussia, PA 19406-1415

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RE: License No. SUB-1590/Docket No. 04009065/Control No. 138835

Mr. Kinneman:

In response to your request for additional information, I submit the following:

1. Our facility will house a maximum of 1,000 kilograms of licensed material at any one time. That figure is based on each machine housing approximately 200kg of Depleted Uranium and a maximum of 5 machines to be disposed. Usually, there is no licensed material present in our facility.
2. Dr. Kopecky has prior experience in the decommissioning of linear accelerators. Veterans Administration Medical Center East Orange, NJ recently hired him to decommission their treatment machines. He has performed tests and surveys associated with prevention of potential hazards. He has been listed on the licenses of the Marlton Center for Cancer in Marlton, NJ and Ocean Radiation Oncology in Lakewood, NJ.
3. We request authorization to transport devices containing licensed materials from (a.) **customer's facility to our facility** (b.) **a customer's facility to another customer's facility** and (c.) **our facility to a customer's facility** without disturbing the licensed material, as has been permitted under our general license.
4. We have included requirements for personal protective equipment in our Radiation Safety Program, and it is attached for your review.
- 5a. Please see the attached organizational chart.
- 5b-e. In response to these sections, we have amended our Radiation Safety Program.

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NMSS/RGNI MATERIALS-002

6. We are currently working with our Radiation Safety Officer and our calibration company to find an appropriate meter for our needs. We may purchase a new probe for our Eberline E-520 and have it calibrated to read in CPM. Currently, we also own a Victoreen Panoramic Model 470A (sn 3309) survey meter, which reads in mr/hr.
7. We will never drill, grind, sand, or otherwise alter or change the physical characteristics of the licensed material in any way.

Please let me know if you require any additional information.

Regards,

A handwritten signature in black ink, appearing to read 'Glenn Davis', with a stylized, flowing script.

Glenn Davis, Vice President
Oncology Services International

CC: Ronald Roan, Dr. Kenneth Kopecky

enclosures

Radiation Safety Program

In order to ensure the safety of our employees, visitors, and the general public, we shall adhere to the following program:

When radioactive material is transported into the warehouse, it will be stored away from working areas and the entire facility will be surveyed for possible contamination. Upon arrival, all information pertaining to the machine will be added to the *DU Record*. All employees will be informed when radioactive material is present in the warehouse and advised to avoid restricted areas when possible. Film badges are currently in use to monitor employees' doses and ensure they are as low as is reasonably achievable.

If this material is part of an intact machine, the entire machine will be labeled "Radioactive" and the surrounding area marked with Caution tape 1 meter (or more, if determined by RSO) from the device. The device will remain as such until it is shipped away by appropriate means or salvaged for parts.

Once the machine has been deemed "scrap," properly trained personnel will survey it and have the hazardous parts removed to the restricted holding area. Any time potentially hazardous material enters or exits the restricted area, the entire facility will be surveyed. All personnel who may come into contact with radioactive material will wear, at a minimum, a protective lab coat (or coverall) and gloves. Eye protection and dust masks are also highly recommended. In the holding area, the machine's parts will be individually removed, surveyed, and separated accordingly. Non-hazardous parts will be discarded by ordinary waste disposal means.

Hazardous parts shall be recorded on the appropriate control form along with identifying information, such as the part number, serial number, manufacturer, mR per hour, counts per minute, and weight. Once all radioactive parts have been identified and recorded, they shall be sealed in a 30-gallon drum and sent to a properly licensed company for disposal. A copy of the disposal certificate will be kept with the appropriate machine. During this process, the DU will be unbolted from aluminum and lead housings. **At no time will the licensed material be sanded, grinded, drilled or altered in any way.** Keeping the licensed material intact prevents release of contamination into the air or water, reducing effects on the general public. Upon completion, a *contamination survey* must be performed on the personnel and their clothing. If trace contamination remains on the protective clothing, it should be carefully removed and placed in a plastic bag for disposal. If material should remain on the technician's skin, he should use paper towels or some sort of cleansing wipes to prevent contaminating sanitary sewers with radioactive material. These wipes should be placed in the same plastic bag for disposal. The tools used to strip the machine must be cleaned and surveyed to prevent harming other employees. A final survey will be performed on the facility once the drums have been shipped to the disposal company.

[Executive Board] – *Consists of Company President, Senior VP's and Junior VP's*
-Responsible for purchasing machines and deciding when machines are to be disposed

[Radiation Safety Officer] – *A qualified, experienced individual contracted by OSI*
- Oversees decommissioning to ensure it is done properly.
- Takes measurements as necessary

[Sensitive Materials Disposal Coordinator] – *Works with others to process decommissioning*
- Performs initial surveys.
- Ensures all equipment is on hand and calibrated (if applicable)
- Completes all necessary paperwork
- Assists Disposal Technician where needed
- Schedules Disposal of licensed material
- Updates Disposal Log
- Performs post-disposal surveys.

[Disposal Technician]
- Mechanically decommissions equipment
- Surveys parts as they are removed.
- Packages and seals material in drums for shipment.