

ACCEPTANCE REVIEW MEMO (ARM)

Licensee: Scela, Inc.

License No.: 11-27664-01MD

Docket No.: 030-35366

Mail Control No.: 471071

Type of Action: Amend

Date of Requested Action: 08-03-06

Reviewer
Assigned:

ARM reviewer(s): Cook

Response	Deficiencies Noted During Acceptance Review
	<p>[] Open ended possession limits. Limit possession. Submit inventory.</p> <p>[] Submit copies of most recent leak test results.</p> <p>[] Add - delete IC license condition. Add IC paragraph in cover letter.</p> <p>[x] Split license from cover letter. Add SUNSI marking to license.</p> <p>[] Ask the licensee if they have any type-amount of EPAct Material.</p>

Reviewer's Initials: _____

Date: _____

- ☐ Yes ☐ No Unrestricted release Group 2 or >: Transfer memo to FCDB within 10 days.
- ☐ Yes ☐ No Decommissioning notification should be completed within 30 days.
- ☐ Yes ☐ No Termination request < 90 days from date of expiration
- ☐ Yes ☐ No Expedite (medical emergency, no RSO, location of use/storage not on license, RAM in possession not on license, other)
- ☐ Yes ☐ No TAR needed to complete action.

Branch Chief's and/or Sr. HP's Initials: _____

Date: _____

SUNSI Screening according to RIS 2005-31

☐ Yes ☒ No Non-Publicly Available, Sensitive if any item below is checked

General guidance:

- _____ RAM = or > than Category 3 (Table 1, RIS 2005-31), use Unity Rule
- _____ Exact location of RAM (whether = or > than Category 3 or not)
- _____ Design of structure and/or equipment (site specific)
- _____ Information on nearby facilities
- _____ Detailed design drawings and/or performance information
- _____ Emergency planning and/or fire protection systems

Specific guidance for medical, industrial and academic (above Category 3):

- _____ RAM quantities and inventory
- _____ Manufacturer's name and model number of sealed sources & devices
- _____ Site drawings with exact location of RAM, description of facility
- _____ RAM security program information (locks, alarms, etc.)
- _____ Emergency Plan specifics (routes to/from RAM, response to security events)
- _____ Vulnerability/security assessment/accident-safety analysis/risk assess
- _____ Mailing lists related to security response

Branch Chief's and/or Sr. HP's Initials: JPC

Date: 8/9/06

ADAMS # MLO62270226
Template
Date 8/15/06 QC'd by SM



www.cardinalhealth.com

RECEIVED

AUG 03 2006

DNMS

July 31, 2006

U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Re: Cardinal Health Nuclear Pharmacy Services, NRC Radioactive Materials License
Number 11-27664-01MD, Boise, ID

Attention Licensing:

Please amend the above referenced license(s) to revise the frequency required for required bioassay for handlers of I-131. This change only affects the frequency of bioassay for I-131, and not I-123, and more accurately mirrors the guidelines in NRC Regulatory Guide 8.20. Please see the attached Bioassay Program Proposed Revision.

If you have any questions, please contact me at 614.757.3116.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Breuning".

Dave Breuning
Health Physicist
Nuclear Pharmacy Services

CC: PRSO, Loc 3306 (Boise)
License File Loc 3306 (Boise) (3)

Encl: Bioassay Program Proposed Revision

Bioassay Program Proposed Revision

In a continuing effort to improve our radiation safety program, the bioassay program was reviewed.

Our current bioassay program states that the following individuals must perform a bioassay:

- a) All individuals that handle an open form of quantities of radioactive iodine greater than or equal to those quantities shown in Table 1 of NRC Regulatory Guide 8.20 (see Appendix C for a copy)
- b) Any employee sufficiently close to the handling process (within a few meters, and in the same room as the worker handling the material).

The bioassays should be performed at this frequency:

- a) Individuals compounding I-131 capsules must perform bioassays weekly and individuals compounding I-123 must perform bioassays between 6 and 24 hours post-handling.
- b) Individuals who are not on a regular bioassay program, but have assisted in decontamination, for example after a spill, shall complete a bioassay between 6 and 24 hours post-exposure.

Upon review of NRC Regulatory Guide 8.20 we have determined that the bioassay frequency schedule can be modified. The proposed changes are as follows:

Individuals whom handle I-131 will be divided into two categories, **frequent and infrequent** handlers. A frequent handler is defined as an individual whom handles I-131 or is sufficiently close to the handling process once every two (2) weeks or more often. An infrequent handler handles I-131 less frequently than, once every two (2) weeks.

Frequent handlers must follow the following bioassay schedule:

- a) Between 6-72 hours after initial handling of I-131, a bioassay must be performed.
- b) After the initial bioassay, a biweekly bioassay schedule will be maintained. A bioassay must be performed once every 2 weeks.
- c) After 3 months of the biweekly bioassay schedule an individual can change their bioassay schedule to monthly if they meet the following condition.
 - During the three month biweekly period, they do not exceed thyroid burden action level one for I-131 (0.04 μ Ci).
- d) If at some point during the monthly bioassay schedule an individual exceeds the thyroid burden action level one. They will revert to the biweekly schedule until three consecutive months have passed with a thyroid burden less than action level one.

Infrequent handlers must perform one bioassay within 6-72 hours following handling I-131.

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7000 CARDINAL PL
DUBLIN OH 43017

LTR

1 OF 1

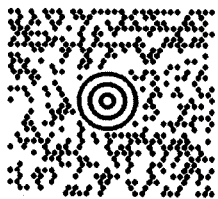
SHIP TO:

US NUC. REG. COMMISSION
611 RYAN PLAZA DR. SUITE 400

ARLINGTON TX 76011-4005

AUG 03 2006

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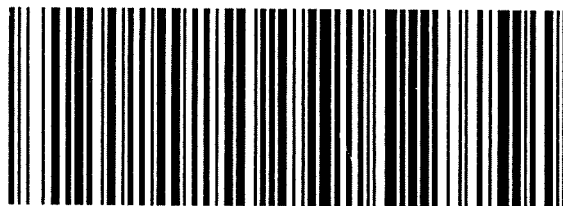
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BILLING: P/P

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CS 8.5.20.0 W001E60 54.0A 04/2006

Applicant Information:**Control No. 471071**

Name: Scela, Inc.	Type of Request: Amend Program Code(s):	
Location: ID	License No.: 11-27664-01MD	Docket No.: 030-35366

STEP 1—Radioactive Materials and Quantities Requested:

Instructions for Step 1: Complete Step 1 for all applications. If all your responses in Step 1 are "No" then do not complete Step 2 (Screening Criteria). Sign and date the completed step-sheet and add it as the sensitive and non-publicly available OAR in ADAMS. If a "yes" response is indicated for any item in Step 1, also complete Step 2. If the type of use is subject to a Security Order or the requirements for increased controls, complete Step 3 (Item A or Item B) without delay.		Yes or No
A.	The request is from a new applicant.	N
B.	NUREG-1556, Volume 20, Section 4.9 indicates a licensing site visit is needed for the requested type of use, e.g., (1) Type A broad scope license, (2) panoramic irradiator containing > 10000 curies, (3) manufacturers or distributors using unsealed radioactive material or significant quantities of sealed material, (4) radioactive waste brokers, (5) radioactive waste incinerators, (6) commercial nuclear laundries, and (7) any other application that in the judgement of the reviewer and cognizant supervisor involves complex technical issues, complex safety questions, or unprecedented issues that warrant a site visit.	N
C.	The applicant requested certain radionuclides and quantities that equal or exceed the Risk Significant Quantity (TBq) values in the table, below, that have been "highlighted" by the reviewer	N

Table of Risk Significant Quantities

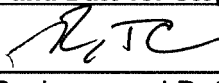
(Category 2 Quantities, IAEA Safety Guide No. RS-G-1.9, Categorization of Radioactive Sources, August 2005)

Radionuclide	Risk Significant Quantity (TBq ¹)	Risk Significant Quantity (Ci ¹)	Radionuclide	Risk Significant Quantity (TBq ¹)	Risk Significant Quantity (Ci ¹)
Am-241	0.6	16	Pm-147	400	11,000
Am-241/Be	0.6	16	Pu-238	0.6	16
Cf-252	0.2	5.4	Pu-239/Be	0.6	16
Cm-244	0.5	14	Ra-226 ²	0.4	11
Co-60	0.3	8.1	Se-75	2	54
Cs-137	1	27	Sr-90 (Y-90)	10	270
Gd-153	10	270	Tm-170	200	5,400
Ir-192	0.8	22	Yb-169	3	81

¹ The primary values are TBq. The curie (Ci) values are for informational purposes only.² The Atomic Energy Act, as amended by the Energy Policy Act of 2005, authorizes NRC to regulate Ra-226 and NRC is in the process of amending its regulations for discrete sources of Ra-226.

Calculations of the Total Activity or the Unity Rule are attached to document whether or not the screening criteria in Step 2 were also completed to evaluate the application. NOTE—If an amendment of an existing license is being requested, the calculations will include the previously authorized quantities for the radionuclide(s).	Yes, No, or Not Applicable (NA)
Total Activity—multiple activities are requested for a single radionuclide and the sum of the activities equals or exceeds the quantity of concern for the radionuclide	—
Unity Rule—multiple radionuclides are requested and the sum of the ratios equals or exceeds unity, e.g., [(total activity for radionuclide A) ÷ (risk significant quantity for radionuclide A)] + [(total activity for radionuclide B) ÷ (risk significant quantity for radionuclide B)] ≥ 1.0.	—

Signature and Date for Step 1:

 9/28/06

License Reviewer and Date