



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

TELEFAX TRANSMITTAL

DATE: August 1, 2006 NUMBER OF PAGES: 7
(Including this page)

SEND TO: Gary Stefanko, Manager Radiology Department

LOCATION: St. Mary's of Michigan

FAX NUMBER: (989) 776-1689

☒ **VERIFY BY CALLING
SENDER**

FROM:
(SENDER) **Bill Reichhold**

TELEPHONE NUMBER (630) 829-9839 FAX NUMBER (630) 829-9782
or
(630) 515-1259

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.

MESSAGE

Please see attached.

NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by telephone and return the original to the above address, by U.S. Mail. Thank you.

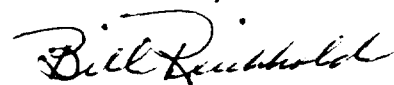
The following additional information is needed to complete the review of your request.

Please be advised that we cannot authorize you to release your old nuclear medicine department located at the Ambulatory Care Center, 4599 Towne Centre, Saginaw, Michigan for unrestricted use (even by other members of your staff) until we have received and reviewed a copy of the results of your close-out survey. The survey should consist of exposure rate measurements to show that all sources of radioactive material have been removed, and contamination checks of areas where radioactive materials were used or stored. Average radiation levels associated with surface contamination and removable contaminations should not exceed those specified in the enclosed decontamination guide. Please submit the following information with your close-out survey:

- a. A history of all radionuclides used at your old nuclear medicine department .
- b. A current copy of the leak test results for the sealed sources used at your old nuclear medicine department . Also a history of leaking sealed sources (if any).
- c. A diagram of your old nuclear medicine department with survey and wipe test results keyed to specific locations. Please note, a diagram of your old nuclear medicine department with survey and wipe test results keyed to specific locations was **not** included with your request dated May 4, 2006.

Please send a facsimile of your response to the above within 7 days and refer to control 315515. Please call me at 630-829-9839 if you have any questions.

From the desk of:

A handwritten signature in black ink, appearing to read "Bill Reichhold". The signature is fluid and cursive, with a large initial "B" and "R".

Bill Reichhold

GUIDELINES FOR DECONTAMINATION OF FACILITIES AND EQUIPMENT
PRIOR TO RELEASE FOR UNRESTRICTED USE
OR TERMINATION OF LICENSES FOR BYPRODUCT, SOURCE,
OR SPECIAL NUCLEAR MATERIAL

U.S. Nuclear Regulatory Commission
Division of Industrial and
Medical Nuclear Safety
Washington, DC 20555

August 1987

The instructions in this guide, in conjunction with Table 1, specify the radionuclides and radiation exposure rate limits which should be used in decontamination and survey of surfaces or premises and equipment prior to abandonment or release for unrestricted use. The limits in Table 1 do not apply to premises, equipment, or scrap containing induced radioactivity for which the radiological considerations pertinent to their use may be different. The release of such facilities or items from regulatory control is considered on a case-by-case basis.

1. The licensee shall make a reasonable effort to eliminate residual contamination.
2. Radioactivity on equipment or surfaces shall not be covered by paint, plating, or other covering material unless contamination levels, as determined by a survey and documented, are below the limits specified in Table 1 prior to the application of the covering. A reasonable effort must be made to minimize the contamination prior to use of any covering.
3. The radioactivity on the interior surfaces of pipes, drain lines, or ductwork shall be determined by making measurements at all traps, and other appropriate access points, provided that contamination at these locations is likely to be representative of contamination on the interior of the pipes, drain lines, or ductwork. Surfaces of premises, equipment, or scrap which are likely to be contaminated but are of such size, construction, or location as to make the surface inaccessible for purposes of measurement shall be presumed to be contaminated in excess of the limits.
4. Upon request, the Commission may authorize a licensee to relinquish possession or control of premises, equipment, or scrap having surfaces contaminated with materials in excess of the limits specified. This may include, but would not be limited to, special circumstances such as razing of buildings, transfer of premises to another organization continuing work with radioactive materials, or conversion of facilities to a long-term storage or standby status. Such requests must:
 - a. Provide detailed, specific information describing the premises, equipment or scrap, radioactive contaminants, and the nature, extent, and degree of residual surface contamination.
 - b. Provide a detailed health and safety analysis which reflects that the residual amounts of materials on surface areas, together with other considerations such as prospective use of the premises, equipment, or scrap, are unlikely to result in an unreasonable risk to the health and safety of the public.

5. Prior to release of premises for unrestricted use, the licensee shall make a comprehensive radiation survey which establishes that contamination is within the limits specified in Table 1. A copy of the survey report shall be filed with the Division of Industrial and Medical Nuclear Safety, U. S. Nuclear Regulatory Commission, Washington, DC 20555, and also the Administrator of the NRC Regional Office having jurisdiction. The report should be filed at least 30 days prior to the planned date of abandonment. The survey report shall:

- a. Identify the premises.
- b. Show that reasonable effort has been made to eliminate residual contamination.
- c. Describe the scope of the survey and general procedures followed.
- d. State the findings of the survey in units specified in the instruction.

Following review of the report, the NRC will consider visiting the facilities to confirm the survey.

TA

ACCEPTABLE SURFACE CONTAMINATION LEVELS

NUCLIDES ^a	AVERAGED ^{b c f}	MAXIMUM ^{b d f}	REMOVABLE ^{b e f}
U-nat, U-235, U-238, and associated decay products	5,000 dpm α /100 cm ²	15,000 dpm α /100 cm ²	1,000 dpm α /100 cm ²
Transuranics, Ra-226, Ra-228, Th-230, Th-228, Pa-231, Ac-227, I-125, I-129	100 dpm/100 cm ²	300 dpm/100 cm ²	20 dpm/100 cm ²
Th-nat, Th-232, Sr-90, Ra-223, Ra-224, U-232, I-126, I-131, I-133	1000 dpm/100 cm ²	3000 dpm/100 cm ²	200 dpm/100 cm ²
Beta-gamma emitters (nuclides with decay modes other than alpha emission or spontaneous fission) except Sr-90 and others noted above.	5000 dpm $\beta\gamma$ /100 cm ²	15,000 dpm $\beta\gamma$ /100 cm ²	1000 dpm $\beta\gamma$ /100 cm ²

^aWhere surface contamination by both alpha- and beta-gamma-emitting nuclides exists, the limits established for alpha- and beta-gamma-emitting nuclides should apply independently.

^bAs used in this table, dpm (disintegrations per minute) means the rate of emission by radioactive material as determined by correcting the counts per minute observed by an appropriate detector for background, efficiency, and geometric factors associated with the instrumentation.

^cMeasurements of average contaminant should not be averaged over more than 1 square meter. For objects of less surface area, the average should be derived for each such object.

^dThe maximum contamination level applies to an area of not more than 100 cm².

^eThe amount of removable radioactive material per 100 cm² of surface area should be determined by wiping that area with dry filter or soft absorbent paper, applying moderate pressure, and assessing the amount of radioactive material on the wipe with an appropriate instrument of known efficiency. When removable contamination on objects of less surface area is determined, the pertinent levels should be reduced proportionally and the entire surface should be wiped.

^fThe average and maximum radiation levels associated with surface contamination resulting from beta-gamma emitters should not exceed 0.2 mrad/hr at 1 cm and 1.0 mrad/hr at 1 cm, respectively, measured through not more than 7 milligrams per square centimeter of total absorber.

(2) Whether sufficient waste disposal capacity is available to allow completion of decommissioning within the allotted 24-month period;

(3) Whether a significant volume reduction in wastes requiring disposal will be achieved by allowing short-lived radionuclides to decay;

(4) Whether a significant reduction in radiation exposure to workers can be achieved by allowing short-lived radionuclides to decay; and

(5) Other site-specific factors which the Commission may consider appropriate on a case-by-case basis, such as the regulatory requirements of other government agencies, lawsuits, ground-water treatment activities, monitored natural ground-water restoration, actions that could result in more environmental harm than deferred cleanup, and other factors beyond the control of the licensee.

(j) As the final step in decommissioning, the licensee shall--

(1) Certify the disposition of all licensed material, including accumulated wastes, by submitting a completed NRC Form 314 or equivalent information; and

(2) Conduct a radiation survey of the premises where the licensed activities were carried out and submit a report of the results of this survey, unless the licensee demonstrates in some other manner that the premises are suitable for release in accordance with the criteria for decommissioning in 10 CFR part 20, subpart E. The licensee shall, as appropriate--

(i) Report levels of gamma radiation in units of millisieverts (microrentgen) per hour at one meter from surfaces, and report levels of radioactivity, including alpha and beta, in units of megabecquerels (disintegrations per minute or microcuries) per 100 square centimeters--removable and fixed--for surfaces, megabecquerels (microcuries) per milliliter for water, and becquerels (picocuries) per gram for solids such as soils or concrete; and

(ii) Specify the survey instrument(s) used and certify that each instrument is properly calibrated and tested.

(k) Specific licenses, including expired licenses, will be terminated by written notice to the licensee when the Commission determines that:

TRANSMISSION VERIFICATION REPORT

TIME : 08/10/2006 08:31
NAME : USNRC
FAX : 6308299782
TEL : 6308299782

DATE, TIME	08/10 08:29
FAX NO./NAME	89897761689
DURATION	00:01:25
PAGE(S)	04
RESULT	OK
MODE	STANDARD



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SEND TO: Gary Stefanko, Manager Radiology Department

LOCATION: St. Mary's of Michigan

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MESSAGE

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NOTICE

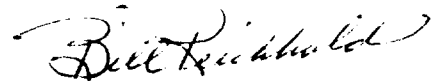
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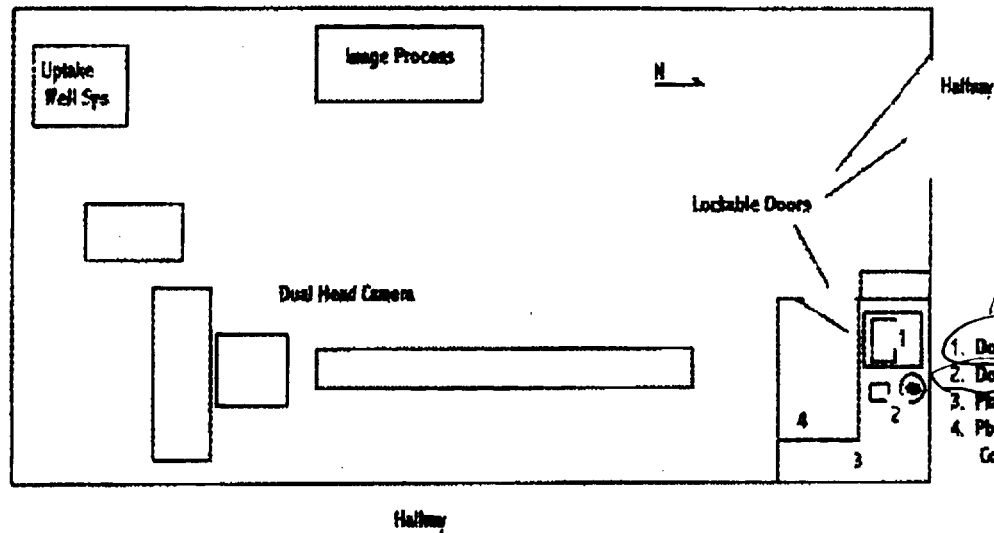
- a. Please confirm that you did not have any history of leaking sealed sources.
- b. Sorry, I'm confused by the close-out survey information you submitted. The areas on the close-out survey do not appear to match the sketch of the old nuclear medicine department. For example, it appears from the sketch that area 1 is the dose preparation area, however, the survey information dated May 2, 2006, indicated area 1 as the hallway. Area 2 on the sketch is the dose calibrator, however, the survey results indicated area 2 as the Hot Lab Door, etc. Again, please submit a diagram of your old nuclear medicine department with survey and wipe test results keyed to specific locations.

Please send a facsimile of your response to the above within 5 days and refer to control 315515. Please call me at 630-829-9839 if you have any questions.

From the desk of:

A handwritten signature in cursive script, reading "Bill Reichhold".

Bill Reichhold



St. Mary's of Michigan
Ambulatory Care Center
Nuclear Medicine

Saginaw Michigan
21-03646-03

St. Mary's of Michigan - Ambulatory Care Center

License # 21-03646-03

Date: 5/2/2006

Performed By: C. Christenson CNMT

Well Counter: Captus

MDA: 19 dpm

Survey Meter: Ludlum 14C EWGM

Check Value: 1.0 mR/hr

Calibrated 07/14/05

Area 1
Hallway?
or
Dose Prep
Area?
Dose
Calibrator
on
Sketch

		cpm	net dpm	mR/h
1	Hallway	160.00	0	0.02
2	Hot Lab Door	185.00	0	0.02
3	Dose Prep	184.00	0	0.02
4	Hot Lab Counter	158.00	0	0.02
5	Hot Lab Floor	159.00	0	0.02
6	Pkg. Receipt	161.00	0	0.02
7	Inj. Chair	159.00	0	0.02
8	Dept. Door	160.00	0	0.02
9	Cam./ CPU	182.00		0.02
10	Cam Floor	164.00		0.02
11	Cam. Table	167.00		0.02
12	North Wall	155.00		0.02
13	South Wall	160.00		0.02
14	East Wall	156.00		0.02
15	West Wall	155.00		0.02
16				
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36				
37	Background	168		0.02

ACTION LEVELS: 2000 dpm

Efficiency (dpm/cpm):

1.26

< 0.2 mR/hr

COMMENTS: No evidence of removable contamination.

RSO Signature: _____

