

Roldan, Lizette

From: John Wood [J.Wood@ampmedicalphysics.com]
Sent: Wednesday, August 24, 2011 7:02 AM
To: Roldan, Lizette
Subject: RE: Disposal of Co-57 sources by DIS request

Ms. Roldan-Otero, I have discussed with the nuclear medicine department at Ivinson Memorial Hospital the issue of disposing "dead" Co-57 marker sources and the proposed request of exemption with the NRC. At this time, we would like to withdraw the exemption request. The sources in question will be maintained on site and inventoried at 6 month intervals.

John Wood
AMP Medical Nuclear Physicist
216-496-7829; 800-709-4855 x 133 vm

From: Roldan, Lizette [mailto:Lizette.Roldan@nrc.gov]
Sent: Tuesday, August 02, 2011 8:53 AM
To: Linda Ramirez; John Wood
Subject: RE: Disposal of Co-57 sources by DIS request

Thanks Linda, you have captured everything we discussed.

John, let me know how Ivinson wishes to proceed. Please have a response by August 31, 2011.

Thanks,

Lizette Roldán-Otero, Ph.D.
U.S. NRC Region IV
Health Physicist
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From: Linda Ramirez [mailto:L.Ramirez@ampmedicalphysics.com]
Sent: Tuesday, August 02, 2011 10:32 AM
To: John Wood
Cc: Roldan, Lizette
Subject: Disposal of Co-57 sources by DIS request

Hi John

Lizette and I had a discussion yesterday about a request that Ivinson sent to dispose of several dead Co-57 button sources. I've attached the AMP draft for review. I had suggested this pathway based on Ed's success in disposing of sources in Ohio, when ODOH allowed it for Co-57, including flood sources. Now, since these are excepted quantities, they probably could have been defaced and disposed without much ado had it not been under a medical license. And if Ivinson still has the paperwork on the receipt of these as excepted, we could be done. As it is, however, if they were received under 35.65, we are setting a precedent. Lizette thought the request was reasonable and the supplied information was sufficient, but has been asked by her supervisor to request the following information (which comes from NUREG 1556, vol, 9 rev 2, Chapter 10: applications for exemptions:

- Why the exemption is needed: (my response would be due to storage space limitations and reduce the burden of quarterly inventory)

- Proposed compensatory safety measures intended to provide a level of health and safety equivalent to the regulation for which the exemption is being requested (my response: N/A; there is no safety issue since these sources are indistinguishable from background upon surface survey)
- Alternative methods for complying with the regulation and why compliance with the existing regulation is not feasible: (my response: cost of using a waste broker is prohibitive for these innocuous sources)

She informs me that a TAR (Technical Assistance Request) must be issued from headquarters. On one hand, because these sources are small and not really taking up space, I suppose we could rescind the request. On the other hand, I sort of like the idea of setting a precedent for others to follow, given that low level waste storage is already pricey and space is becoming critical. I suppose it's up to you and Ivinson to make the decision, but I say go for it! I've CC'd Lizette to ensure that I've provided accurate information.

Thanks so much and I hope all is well!

Regards,

Linda Ramirez

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"Nothing in life is to be feared—it is to be understood" –Marie Curie

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