

FRANKFORD-MAYFAIR DIAGNOSTIC SERVICES

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37-19272

John E. Glenn, Ph.D., Chief
Nuclear Materials Section B
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Ave.
King of Prussia, PA 19406

2-1-85

Dear Dr. Glenn,

Please find our timely submission for our License No. 37-19272-01 renewal enclosed. In addition to the enclosed application data, we wish to state the following:

1. As an alternative to the procedure of activity linearity measurement for dose calibrators listed in the Licensing Guide 10.8-27, E, we wish to submit the enclosed S.C.L.C.M. method to be performed by our consultant physicists, Walter L. Robinson & Associates, quarterly, and only after running the old method in conjunction to assure a comparison of accuracy of $\pm 5\%$.
2. We wish the latitude to utilize any service providing radiation survey meter calibrations that has been approved by the N.R.C. or Agreement State. We will also possess the license number that the procedure is on file with the N.R.C. or Agreement State. An example would be Radiation Management Inc., Philadelphia, PA.
3. All other parts of Appendix D will be followed except page 10.8-27, Item C. 4., 5., 6., 7. In lieu of this we will calculate the difference in inaccuracy in %, and record this in a log to assure $\pm 5\%$ variation of a computer-decayed table (sample enclosed) of reference standards, which is posted by the dose calibrator.
4. We wish to amend the commitment to a thin-end window G-M survey meter as referred to on page 10.8-33(2.f.). Our meter is a thin side window G.M., which we feel is adequate in conjunction with our Picker gamma camera, which is used for measuring wipe test samples, since it has a scaler with one, tens, and hundreds places, thus providing the necessary sensitivity.

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By.	Brown
Orig. To.	
Action Compl.	2/20/85

Applicant.	2584 (7C)
Check No.	1580
Amount/Fee Category	Renewal
Check Date	2/19/85
By	Brown

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Currently our radiopharmaceuticals are supplied by a radiopharmacy such as Nuclear Pharmacy or Mallinckrodt Nuclear, and our receipt of radioactive material is only during office hours. We also return all spent syringes, vials, and contaminated waste after decay to background to the radiopharmacy. If and when we wish to return to a Mo-99/Tc-99m generator or off-duty delivery, we will utilize the recommended ordering, handling, and security measures described in Appendices E., F., and J. We would also measure all generators and pack them according to D.O.T. regulations upon return to the manufacturer.

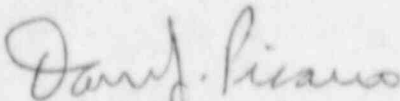
6. Our technologist training program is as per the subjects listed in 10 CFR 19.12, but not limited to this. The review is provided in the form of in-services given by our consultant radiation physicists, Walter L. Robinson & Associates quarterly. For clerical and housekeeping personnel, we initially provide written guidelines and follow annually with verbal review of radiation safety instructions from our nuclear medicine technologist. Videotaped in-services from our consultant physicists will also be available for use.

7. The model program for keeping radiation exposures A.L.A.R.A. as stated in Appendix O will be used as they apply to physician office facilities. Since we have no Radiation Safety Committee per se, we do review the status of our program of radiation safety quarterly with our radiation physicists.

Please also send a confirming notice of receipt of this submission, and a statement that our license, although under review, is still in force, so that we may reassure radiopharmaceutical suppliers.

If there are any questions with regard to this renewal application, please direct them to our consultant physicist, Walter L. Robinson at 717-397-2569.

Sincerely,


Daniel Pisano, M.D.