

20 JAN 1988

License No. 20-01212-10  
Docket No. 030-01833  
Control No. 108090

Massachusetts Eye and Ear Infirmary  
ATTN: Ephraim Friedman, M.D.  
President  
243 Charles Street  
Boston, Massachusetts 02114

Gentlemen:

This is in reference to your application dated November 30, 1987 to renew License No. 20-01212-10. In order to continue our review, we need the following additional information:

1. Your application does not contain a description of the duties and responsibilities of the Radiation Safety Officer (RSO). Please review the enclosed 10 CFR 35.21(b) which includes RSO duties and responsibilities that NRC finds acceptable and submit your equivalent duties and responsibilities.
2. You have not included a description of the training and experience in byproduct material use of the proposed RSO. NRC expects the RSO to have training and experience in the use of isotopes of equivalent hazard to those authorized on your license. This experience should exceed that of the average authorized user/supervisor. Please submit this information.
3. Your application indicates that individuals who will handle byproduct material will be trained by your authorized user/supervisors and not necessarily by the RSO. Please detail what minimum training would be provided to these personnel (outline, with description of any tests administered). The training must be provided by someone knowledgeable in radiation safety.
4. Please confirm that records of all survey results and calculations will be maintained on site.
5. Please provide greater detail on minimum survey frequencies which will be maintained in your laboratories where byproduct material is used. It is appropriate to categorize laboratories according to the quantity and type of isotope hazards present and to adjust survey frequencies accordingly. Please also indicate the type of surveys to be performed and kind of instrumentation used for evaluation.
6. Please describe the minimum instrumentation you will maintain.
7. Please provide greater detail on your proposed personnel dose monitoring program. What types of dosimeters will be used? Who will process dosimeters and at what frequency? Does registration of personnel as discussed in 6.4 of your application guarantee issuance of personnel dosimetry?

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8. Your minimum laboratory procedures should be described in greater detail than indicated in 6.1 of your application. Please provide these procedures.
9. Please specify exactly which laboratories may be used for licensed activities under NRC License 20-03814-80. These areas should be maintained distinctly separate.
10. Page 3 of your application is a request for full authorization for named individuals. The submitted training and experience records for each of these individuals does not indicate experience with the use of many other isotopes which your license authorizes, and that in fact present other hazards requiring additional safety precautions. Dr. Wells submittal does not indicate experience with high energy beta emitting isotopes or iodination experience. Dr. Crean's submittal is similar to the 1986 submittal in which he was granted authorization for C-14, Ca-45, S-35 and P-33. No information was submitted for Dr. Guinan.

Please note that your application does not appear to include training and experience records for Dr. White, Dr. Latina, Ms. McGee or Ms. Grondin. Dr. Yandell's and Dr. Dedek's resume's do not include experience with byproduct material use and Dr. Daniels submittal includes a minimal experience handling S-35. Please provide the missing training and experience records. Please only provide that information specific to radioisotope training and experience.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 108090.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Sincerely,

~~Original Signed By~~  
John E. Glenn

Thomas K. Thompson  
Nuclear Materials Safety Section B  
Division of Radiation Safety  
and Safeguards

Enclosure: 10 CFR Part 35

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# CONVERSATION RECORD

TIME  
2:30

DATE  
11/17/87

TYPE

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☐ INCOMING

☒ OUTGOING

ROUTING

NAME/SYMBOL	INT

LOCATOR

RE/Conference:

NAME  
WITH

CONTACTED OR IN CONTACT

ORGANIZATION (Office, dept., bureau,  
etc.) Massachusetts Eye  
and Ear Infirmary

TELEPHONE NO.

(617) 573-3121

Jim McGilivray

SUBJECT

Pending need for renewal of License No  
20-01212-10

SUMMARY

Mr. McGilivray stated that he is still working  
on the renewal application and needs to make  
few changes in the program. He knows that  
he must get the application in by the end  
of the month.

ACTION REQUIRED

Telephone Inquiry Letter

NAME OF PERSON DOCUMENTING CONVERSATION

Steven Courtemanche

SIGNATURE

Steven Courtemanche

DATE

11/17/87

ACTION TAKEN

SIGNATURE

TITLE

DATE

11/30