

3-579) the follow
on NRC Form
Register 45334

33, 34.

APPLICATION FOR MATERIAL LICENSE

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED BY OMB
3180-0120
Expires: 5-31-87

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

FEDERAL AGENCIES FILE APPLICATIONS WITH:

U.S. NUCLEAR REGULATORY COMMISSION
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY, NMSS
WASHINGTON, DC 20555

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS, IF YOU ARE LOCATED IN:

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION I
NUCLEAR MATERIAL SECTION B
631 PARK AVENUE
KING OF PRUSSIA, PA 19406

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

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MATERIAL RADIATION PROTECTION SECTION
101 MARIETTA STREET, SUITE 2900
ATLANTA, GA 30323

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U.S. NUCLEAR REGULATORY COMMISSION, REGION III
MATERIALS LICENSING SECTION
799 ROOSEVELT ROAD
GLEN ELLYN, IL 60137

ARKANSAS, COLORADO, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, SOUTH DAKOTA, TEXAS, UTAH, OR WYOMING, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
MATERIAL RADIATION PROTECTION SECTION
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TX 76011

ALASKA, ARIZONA, CALIFORNIA, HAWAII, NEVADA, OREGON, WASHINGTON, AND U.S. TERRITORIES AND POSSESSIONS IN THE PACIFIC, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION V
MATERIAL RADIATION PROTECTION SECTION
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CA 94598

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTION.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- ☒ A. NEW LICENSE
☒ B. AMENDMENT TO LICENSE NUMBER N.Y. Lic 26662-1
☐ C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (Include Zip Code)

Amulatory Foot Care Assoc
810 Abbott Ave
Fort Lee, New Jersey

3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED.

Dr. A. Louis Shure (Amulatory Foot Care Assoc)
810 Abbott Ave
Fort Lee, New Jersey

Send All Mail to:

Dr. A. Louis Shure
Amulatory Foot Rehabilitation Sues
N.Y. N.Y. 10021

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Dr. A. Louis Shure

TELEPHONE NUMBER

(212) 288-4549

SUBMIT ITEMS 5 THROUGH 11 ON 8 1/2 x 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number, b. chemical and/or physical form, and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES

8507050210 850517
REG1 LIC30

PDR

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSEE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY 7c AMOUNT ENCLOSED \$ 580 pending

13. CERTIFICATION (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, AND 40 AND THAT ALL INFORMATION CONTAINED HEREIN, IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948, 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

SIGNATURE-CERTIFYING OFFICER

Dr. A. Louis Shure

TYPED/PRINTED NAME

A. Louis Shure DPM

TITLE

Director

DATE

9/28/84

14. VOLUNTARY ECONOMIC DATA

a. ANNUAL RECEIPTS

<\$250K	\$1M-3.5M
\$250K-500K	\$3.5M-7M
\$500K-750K	\$7M-10M
\$750K-1M	>\$10M

b. NUMBER OF EMPLOYEES (Total for entire facility excluding outside contractors)

c. NUMBER OF BEDS

d. WOULD YOU BE WILLING TO FURNISH COST INFORMATION (Dollar and/or staff hours) ON THE ECONOMIC IMPACT OF CURRENT NRC REGULATIONS OR ANY FUTURE PROPOSED NRC REGULATIONS THAT MAY AFFECT YOU? (NRC regulations permit it to protect confidential commercial or financial—proprietary—information furnished to the agency in confidence)

☐ YES

☐ NO

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	COMMENTS	APPROVED BY
"OFFICIAL RECORD COPY"				DATE
AMOUNT RECEIVED	CHECK NUMBER			

PRIVACY ACT STATEMENT

Pursuant to 5 U.S.C. 552a(e)(3), enacted into law by section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission on NRC Form 313. This information is maintained in a system of records designated as NRC-3 and described at 40 Federal Register 45334 (October 1, 1975).

1. **AUTHORITY:** Sections 81 and 161(b) of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2111 and 2201(b)).
2. **PRINCIPAL PURPOSE(S):** The information is evaluated by the NRC staff pursuant to the criteria set forth in 10 CFR Parts 30, 32, 33, 34, 35 and 40 to determine whether the application meets the requirements of the Atomic Energy Act of 1954, as amended, and the Commission's regulations, for the issuance of a radioactive material license or amendment thereof.
3. **ROUTINE USES:** -The information may be (a) provided to State health departments for their information and use; and (b) provided to Federal, State, and local health officials and other persons in the event of incident or exposure, for their information, investigation, and protection of the public health and safety. The information may also be disclosed to appropriate Federal, State, and local agencies in the event that the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, or local agency to the extent relevant and necessary for an NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you.
4. **WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION:** Disclosure of the requested information is voluntary. If the requested information is not furnished, however, the application for radioactive material license, or amendment thereof, will not be processed. A request that information be held from public inspection must be in accordance with the provisions of 10 CFR 2.790. Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned need to inspect the document.
5. **SYSTEM MANAGER(S) AND ADDRESS:** U.S. Nuclear Regulatory Commission
Director, Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555

CITY OF NEW YORK
RADIOACTIVE MATERIALS LICENSE

Page 1 of 4 Pages

Pursuant to the New York City Charter and Article 175 of the New York City Health Code, and in reliance on statements and representations heretofore made by the licensee designated below, a license is hereby issued authorizing such licensee to transfer, receive, possess and use the radioactive material(s) designated below; and to use such radioactive materials for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules, regulations, and orders now or hereafter in effect of all appropriate regulatory agencies and to any conditions specified below.

Licensee 1. Name: Louis A. Shure, D.P.M., P.C.		3. License number 2662-1
2. Address: 631 Park Avenue New York, N.Y. 10021		4. Expiration date: November 30, 1988
		5. Reference number
6. Radioactive materials (element and mass #)	7. Chemical and/or physical form	8. Maximum quantity licensee may possess at any one time
(A) Iodine 125	(A) Sealed Source (Atomic Energy of Canada Ltd) (Model No. AECL-C-324)	(A) 500 Millicuries

CONDITIONS

9. Authorized use:

(A) To be used in a Lixiscope (Model #LSM-82) for the purpose of diagnostic imaging of the human foot.

10. (A) The licensee shall comply with the provisions of Article 175 of the New York City Health Code, entitled "Radiation Control".

(B) Failure to pay the fee for inspection of a radioactive material site, upon notification from the Department will result in termination of this license.

11. Radioactive material shall be used only by Louis A. Shure, D.P.M.

12. Radioactive material shall be used only at 631 Park Avenue, New York, New York 10021.

13. The licensee shall not open or remove sealed sources containing radioactive material from their respective source holders.

Date: NOV 15 1983

RC-12(7/90)
(COL-6a CH 10-62)

FOR THE NEW YORK CITY DEPARTMENT OF HEALTH
by Perry A. Letsinger
Perry A. Letsinger, Chief
Radioactive Materials Division

CITY OF NEW YORK
RADIOACTIVE MATERIALS LICENSE

Page 2 of 4 Pages

AMENDMENT NUMBER LICENSE NUMBER 2662-1

14. A) (1) Each sealed source containing radioactive material, other than Hydrogen 3, with a half-life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed six (6) months. In the absence of a certificate from a transferor indicating that a test has been made within six (6) months prior to the transfer, the sealed source shall not be put into use until tested.

(2) Notwithstanding the periodic leak test required by this condition, any licensed sealed source is exempt from such leak tests when the source contains 100 microcuries or less of beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.

(3) The periodic leak test required by this condition does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another person unless they have been leak tested within six (6) months prior to the date of use or transfer.

(B) The test shall be capable of detecting the presence of 0.005 microcurie of removable contamination on the source. The test sample shall be taken from the sealed source or from the surfaces of the device in which the sealed source is permanently mounted or stored, on which one might expect contamination to accumulate.

(C) Record of leak results shall be kept in units of microcuries, and maintained for inspection by the Bureau for Radiation Control.

(D) If the test reveals the presence of 0.005 microcurie or more of removable contamination, the licensee shall immediately withdraw the sealed source from use, and shall cause it to be decontaminated and repaired, to be disposed of in accordance with Department Regulations. A report shall be filed within five (5) days of the test with the Radioactive Materials Unit, Bureau for Radiation Control, 65 Worth Street, New York, N.Y. 10013, describing the equipment involved, the test results, and the corrective action taken.

15. Radioactive material shall be stored in a locked facility in the original shipping container or a container providing equivalent radiation protection. Such a facility may be a cabinet, a safe, or a room providing the facility is locked at all times when no activities are in progress relating to the use of the radioactive material.

16. (a) The Lixiscope shall be labelled in accordance with Section 175.110(c)(1) of Article 175, of the New York City Health Code.

(b) The Lixiscope shall be labelled to warn the user to keep his hands out of the beam.

Date _____

RC-11(7/80)(COL-6ACH)

FOR THE NEW YORK CITY DEPARTMENT OF HEALTH
by _____
Perry A. Letsinger, Chief
Radioactive Materials Division

CITY OF NEW YORK
RADIOACTIVE MATERIALS LICENSE

Page 3 of 4 Pages

AMENDMENT NUMBER LICENSE NUMBER-2662-1

17. The Lixiscope shall be used by the licensee, who as a minimum shall have successfully completed the Lixiscope of America Inc., training program or an equivalent U.S. Nuclear Regulatory Commission or Agreement State approved training program.

18. Written instructions contained in the Lixiscope Instruction Manual shall be followed and a copy of these instructions shall be made available to each individual using or having responsibility for use of radioactive material. Any changes in these instructions shall have the prior approval of the Bureau of Radiation Control, New York City Department of Health.

19. Upon receipt of the Lixiscope and the Iodine-125 source, and prior to the initiation of a diagnostic imaging program, a radiation survey shall be conducted to determine the maximum exposure rate where the useful beam will enter a patient, and at 45 degree angle around the unit at a distance of 6 and 12 inches. A detailed report of the results of this survey shall be sent to the Bureau For Radiation Control, New York City Department of Health not later than thirty (30) days following the installation of the source.

20. Leak tests of sealed sources shall be performed in accordance with Section 175.106(K) of Article 175 of the New York City Health Code, and analyzed by Stan A. Huber Consultants, or other persons specifically authorized by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.

21. The licensee shall have available an appropriate survey meter which shall be maintained operational and shall be maintained operational and shall be calibrated a minimum of once in every 12 months. Records of all calibrations shall be kept a minimum of three (3) years.

22. The licensee is required to wear an extremity monitoring device in the form of a ring thermoluminescent dosimeter (TLD) at all times when operating the Lixiscope. The extremity monitoring device shall be worn on the middle finger of the hand used to operate the Lixiscope and shall be exchanged on a monthly basis.

23. The licensee shall ensure that the Lixiscope is leak tested at six (6) month intervals, using procedures described in the Lixiscope of America, Inc. Instruction Manual or other procedures approved by the U.S. Nuclear Regulatory Commission or Agreement States. The test shall be capable of detecting the presence of 0.005 microcuries of removable surface contamination.

24. Sealed source installation removal or maintenance operations shall be performed only by the sealed source manufacturer or other persons specifically licensed to do so.

Date _____

RC-11(7/80) (COL-6ACH)

FOR THE NEW YORK CITY DEPARTMENT OF HEALTH
by _____
Perry A. Letsigner, Chief
Radioactive Materials Division

CITY OF NEW YORK
RADIOACTIVE MATERIALS LICENSE

Page 4 of 4 Pages

AMENDMENT NUMBER

LICENSE NUMBER-2662-1

25. The licensee shall develop an inventory control program to maintain accountability of the licensee's Lixiscope and document by records, receipt, transfer, use, and disposal of Lixiscopes of the licensee. A physical inventory shall be made at six (6) month intervals and records should be retained for inspection by the Bureau for Radiation Control, New York City Department of Health.

26. Unserviceable or unwanted source housing assemblies containing radioactive sources shall be returned to Lixiscope of America, Inc., the sealed source manufacturer, or other persons specifically licensed to receive the unit.

27. When not in use, the Lixiscope shall be locked to prevent the source from being inadvertently put in the unshielded position and the unit shall be stored in a locked metal case.

28. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Subitems 6, 7 and 9 of this license in accordance with statements, representations procedures contained in
(1) Application dated August 12, 1983.

(2) Letters dated August 22, 1983, September 7, 1983, and October 26, 1983 (and attached information).

(3) Training Certificate of Medical Users Training course for sealed source diagnostic device, dated June 24, 1983.

Date _____

RC-11(7/80) (COL-6ACH)

FOR THE NEW YORK CITY DEPARTMENT OF HEALTH
by _____
Perry A. Letsinger, Chief
Radioactive Materials Division

APPLICATION FOR MATERIAL LICENSE

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MATERIALS LICENSING SECTION
799 ROOSEVELT ROAD
GLEN ELLYN, IL 60137

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1450 MARIA LANE, SUITE 210
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- ☒ A. NEW LICENSE
☒ B. AMENDMENT TO LICENSE NUMBER N.Y Lic 26662-1
☐ C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (Include Zip Code)

Amblulatory Foot Care Assoc.
Dr. A. Louis Shure
810 Abbott Ave
Fort Lee, New Jersey

3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED.

Dr. A. Louis Shure (Amblulatory Foot Care Assoc)
810 Abbott Ave
Fort Lee, New Jersey

Dr. A. Louis Shure
Amblulatory Foot Rehab. Services
631 Park Ave
N.Y N.Y 10021 Lic 26662-1

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Dr. A. Louis Shure

TELEPHONE NUMBER

(212) 288-4949

SUBMIT ITEMS 5 THROUGH 11 ON 8 1/2 x 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

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9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

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12. LICENSEE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY 7C AMOUNT ENCLOSED \$ 580 pending

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SIGNATURE—CERTIFYING OFFICER

Dr. A. Louis Shure

TYPED/PRINTED NAME

A. Louis Shure DPM Director.

TITLE

DATE

9/28/84

14. VOLUNTARY ECONOMIC DATA

a. ANNUAL RECEIPTS

< \$250K	\$1M-3.5M
\$250K-500K	\$3.5M-7M
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☐ YES

☐ NO

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AMOUNT RECEIVED	CHECK NUMBER			DATE

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Director, Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

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Dr. A. Louis Shure, P.C.

631 Park Avenue
(Between E. 65th and E. 66th Sts.)
New York, N.Y. 10021
(212) BUtterfield 8-4949

SPECIAL EMERGENCY PROCEDURES FOR RADIUM AND OTHER SEALED
SOURCES (Reference-NCRP Report #40 "Protection
Against Radiation from Brachytherapy Sources")

LOSS OF SOURCES

1st Report immediately any loss of sealed sources to the Radiation Safety
Office and person-in-charge;

Notify Ambulatory Foot Rehabilitation Services Phone No. (212) 288-4949
631 Park Avenue, New York, N.Y. 10021 Phone No. (212) 288-4685

2nd Report loss to the N.Y. City Health Department at 566-7752; if no answer
phone 340-4494 or 4495.

3rd Keep all linen, dressings, clothing, trash containers, etc., in the room
in which the lost source was last known to be.

LEAKAGE OF SOURCES

1st Make no immediate attempt to clean up or contain the leakage.

2nd Close all windows. Shut off all fans and air conditioners. Have all persons
leave the room, and close and lock all doors to the room.

3rd If radium, radon or other powdered or gaseous radioactive materials are involved,
seal the door and all other openings to the room with masking tape or adhesive
tape and heavy paper.

4th Report to the Radiation Safety Officer and person-in-charge at the phone
numbers listed above.

5th Report to the N.Y. City Health Department at the phone number above.

6th Prohibit entrance to the room unless and until authorized by the Radiation
Safety Officer.

7th Check all persons who may have been contaminated for radiation.

8th If no survey meter is available, assume all persons who have been involved
to be contaminated. Take wipes on the clothing, body surfaces, and head
orifices, using pieces of cotton, tissue or filter paper, and seal these
wipes in separate envelopes for later assay.

9th Place all contaminated clothing assumed to be contaminated, in a sealable
bag or container so as not to cause contamination of floors, furniture, etc.

10th Remove all contaminated persons, or persons assumed to be contaminated,
to a wash area. Have these persons wash themselves with soap or mild detergent
and water. Give special emphasis to the finger nails and the toe nails,
nostrils, scalp, ears, and body folds.

INSPECTION REPORT — NOTICE OF VIOLATION

PG ____ OF ____

OWNER LOUIS SHURE Pod D	D/B/A	C.C. NO.
ADDRESS 631 PARK AVE	BORO MAN	PERMIT NO. 2662-1
BUREAU RADIATION CONTROL	PROGRAM RAD MAT	DATE 2/1/84


ITEM
NUMBER

DESCRIPTION OF VIOLATIONS

Nº 132051

NO VIOLATIONS OF ARTICLE 17Y
NYS HEALTH CODE AT TIME OF
INSPECTION

NOTICE: Department of Health employees must show identification on request.

RECEIVED BY 	SIGNATURE & BADGE Mammal [Signature] 2/1/84	SUPERVISOR'S SIGNATURE [Signature]	DATE 2/1/84
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PENALTY FOR FALSIFICATION: Falsification of any statement made herein is an offense punishable by a FINE of not more than \$500 or not more than 60 days imprisonment or both. — NYC ADMINISTRATIVE CODE, SEC 1151-9.0.

STATE OF NEW YORK

NOTICE TO EMPLOYEES

STANDARDS FOR PROTECTION AGAINST RADIATION



YOUR EMPLOYER'S RESPONSIBILITY

The transfer, receipt, possession or use of all sources of ionizing radiation in the State of New York is controlled by the applicable rules, regulations and orders of either the New York State Departments of Labor or Health or the New York City Department of Health. These agencies require either the registration or licensing of all significant radiation sources and they require your employer to post or otherwise make available to you a copy of the applicable regulations, license and registration and the operating procedures applying to the work in which you are engaged and to explain relevant provisions to you. The applicable regulation in this installation is Part 16 of the New York State Sanitary Code.

YOUR RESPONSIBILITY AS A WORKER

You should familiarize yourself with the provisions of the New York State Sanitary Code, license and registration and the operating procedures which apply to the work in which you are engaged. You should observe these provisions for your own protection and the protection of your co-workers.

WHAT IS COVERED BY THESE REGULATIONS

1. Limits on exposure to radiation and radioactive material in controlled and uncontrolled areas;
2. Measures to be taken after accidental exposure;

3. Personnel monitoring, surveys and equipment;
4. Caution signs, labels, and safety interlock equipment;
5. Exposure records and reports; and
6. Related matters.

REPORTS ON YOUR EXPOSURE TO RADIATION

If you work where personnel monitoring equipment is required, the New York State Department of Health requires your employer to provide you, upon request, a written report of your exposure to radiation both annually and at the time that you terminate employment. The New York State Department of Health also requires your employer to give you a written report if you receive any exposure in excess of the limits set for occupation exposure.

INSPECTIONS

All activities licensed or registered with the regulatory agencies in the State of New York are subject to inspection by representatives from these agencies.

INQUIRIES

Inquiries dealing with matters outlined above can be directed to the Bureau of Radiological Health, New York State Department of Health, Empire State Plaza, Tower Building, Albany, New York 12237.

POSTING REQUIREMENT

Copies of this notice must be posted where employees working in or frequenting any portion of controlled areas can observe a copy on the way to or from their place of employment.

LIxi

CERTIFICATE OF LEAK TEST

CUSTOMER:

Dr. Louis Shure

SERIAL NO. OF SOURCE 3396
ISOTOPE I¹²⁵ ACTIVITY 437mCi
REMARKS _____
MANUFACTURER AECL
CALIBRATION TEST DATE 8/29/84

This is to certify that the leak test on the above source
was performed by AECL on 8/22/84
(Testing Facility) (Date)

and validated by T. J. Simpson of that facility.

It was determined that the level of removable contamination was below 0.005 microcurie.

The original certificate is on file at Lixi, Inc.

NOTE: Removable contamination equal to or greater than
0.005 microcurie constitutes a leaking source.

DATE: 8/24/84

SIGNED: [Signature]

/kp
6/6/83

Certificate of Compliance for Type A Package

The package provided by Lixi, Inc. has been tested in accordance with the Department of Transportation Title 49 Part 178.350 — "Specification 7A: general packaging, Type A." Lixi, Inc. will certify that its packaging complies with Part 178.350. In addition it complies with the applicable requirements of Parts 173.24, 173.391, 173.395 and 173.398, only when a Lixi source holder head with an Iodine-125 capsule is shipped in the package.

Any shipper who uses this package to ship an I-125 source holder head is required to maintain a copy of this certificate for a period of six months after shipment.

The Lixi, Inc. Type A package is constructed as follows:

- 1) A stainless steel cylinder with an Iodine-125 sealed source housed inside with double locking rings to prevent disassembly of the internal shaft.
- 2) The steel cylinder is packaged inside a steel can.
- 3) The steel can is overpacked with fiberboard/foam cushioning material and a fiberboard carton which is sealed with tape.

In accordance with DOT Title 49 Part 173.398(b) for Type A packaging the package complies with the following test:

- 1) Heat: +180°C (1 hr).
- 2) Cold: -40°C (20 min).
- 3) Reduced Pressure: The source is immersed in ethanediol and the pressure in the vessel reduced to 100mm of mercury.
- 4) Vibration: For 90 min. 25 to 80 HZ at 1.5mm amp peak to peak and 80 to 2000 HZ at 20g.
- 5) Water Spray: Exempt because outer layer is steel. The fiberboard carton is used only as a sealing mechanism for shipment by common carrier.
- 6) Free Drop: The steel can survives a 4 foot drop onto a flat unyielding horizontal surface. The isotope holder itself survives a 22 foot drop without releasing any radiation. The iodine-125 capsule survives 200g (7oz) impact from one meter.
- 7) Corner Drop: Exempt
- 8) Penetration: A steel cylinder 1¼ inches in diameter and weighing 13 pounds dropped from a height of 40 inches does not penetrate the steel can.
- 9) Compression: The package does not deform after 24 hours under a weight of 75 pounds which is five times its weight.
- 10) Radiation Reading at Surface: Less than 0.5mR per hour with a 500mCi in the package.



INSTRUCTIONS FOR RETURN SHIPMENTS OF I¹²⁵ SOURCE HEADS

This shipment of radioactive materials is controlled by a number of government agencies, including the Department of Transportation (DOT), the Nuclear Regulatory Commission (NRC), and Agreement States. These agencies regulate proper packaging for shipment, marking, labeling, and certification of the packages by the shipper. You, as a shipper, are responsible to see that all regulations are complied with. We strongly encourage you to refer to the latest copy of the DOT Hazardous Materials Regulations in 49CFR Parts 100 to 199.

The package we have provided to you should be adequate for the shipment of your I-125 source head, however, the final determination of the adequacy is your responsibility as the shipper. It is a legal requirement that you monitor the package you ship for contamination and

external radiation dose rate prior to shipment to Lixi, Inc. Prepare your shipment in the following manner:

1. Remove the spent source holder from the **LIXI** scope. Unpack the new source holder and install it on the unit.
2. Place the spent source holder into the canister provided and seal the canister. Do not remove the radiation label from the source holder.
3. The shipping kit provided with your source holder contains all materials needed to return spent source holders to Lixi, Inc. The kit includes a shipping carton, a padded source holder canister, a return address label, sealing tape, and a Type A Package Certificate.
4. Place the canister in the carton provided and tape the carton closed.

5. Effective July 1, 1983, the Department of Transportation revised their regulations. These changes affect the shipment of **LIXI** scopes and **LIXI** scope source holder heads.

The **LIXI** scope source holder head is classified as "Radioactive Material Instrument and Articles UN2911" per 49CFR 173.422, 173.424. Therefore, no labeling or marking is required on the package. When shipped in a Type A container, along with the following statement on the packing slip inside the package, a **LIXI** scope source holder head may be shipped by air or UPS.

"This package conforms to conditions and limitations specified in 49 CFR 173.422 for Radioactive Material, Instruments and Articles, UN2911".

The shipping container Lixi, Inc. has provided is a Type "A" container. A Type A Package Certificate has been provided for you to retain in your file as required by DOT regulations.

6. Affix the address label which we have provided.

7. Using a suitable survey meter, carefully measure the radiation dose on all six surfaces of the package. This reading must **not** exceed 0.5 milliroentgens per hour at the surface. If it does, please call Lixi, Inc. Customer Service Department for proper labels.

8. Prior to shipment, you are required to determine that the exterior contamination level of your package is within allowable limits. If your organization does not have a contamination control procedure, you may use the procedure described on page 4.

These instructions should be adequate for shipment of Iodine-125 source heads to Lixi, Inc. If you are in doubt about any part of the procedure, please do not make the shipment. Call Robert J. Savini or Bruce Van Pelt at (312) 620-4646 for assistance.

Remember to replace the batteries in the **LIXI** scope whenever the screen becomes dim. Use only alkaline power cells.

DECAY CHART FOR IODINE-125

ONE mCi EQUIVALENT

Age	Decay Factor	Age	Decay Factor	Age	Decay Factor	Age	Decay Factor
0	1.0000	90	0.3536	180	0.1251	270	0.0442
2	0.9772	92	0.3456	182	0.1222	272	0.0432
4	0.9549	94	0.3377	184	0.1194	274	0.0422
6	0.9330	96	0.3300	186	0.1167	276	0.0413
8	0.9117	98	0.3224	188	0.1140	278	0.0403
10	0.8909	100	0.3151	190	0.1114	280	0.0394
12	0.8706	102	0.3079	192	0.1089	282	0.0385
14	0.8507	104	0.3008	194	0.1064	284	0.0376
16	0.8313	106	0.2940	196	0.1040	286	0.0368
18	0.8123	108	0.2873	198	0.1016	288	0.0359
20	0.7937	110	0.2807	200	0.0993	290	0.0351
22	0.7756	112	0.2743	202	0.0970	292	0.0343
24	0.7579	114	0.2680	204	0.0948	294	0.0335
26	0.7406	116	0.2619	206	0.0926	296	0.0328
28	0.7237	118	0.2559	208	0.0905	298	0.0320
30	0.7072	120	0.2501	210	0.0884	300	0.0313
32	0.6910	122	0.2444	212	0.0864	302	0.0306
34	0.6752	124	0.2388	214	0.0844	304	0.0299
36	0.6598	126	0.2333	216	0.0825	306	0.0292
38	0.6447	128	0.2280	218	0.0806	308	0.0285
40	0.6300	130	0.2228	220	0.0788	310	0.0279
42	0.6156	132	0.2177	222	0.0770	312	0.0272
44	0.6016	134	0.2127	224	0.0752	314	0.0266
46	0.5878	136	0.2079	226	0.0735	316	0.0260
48	0.5744	138	0.2031	228	0.0718	318	0.0254
50	0.5613	140	0.1985	230	0.0702	320	0.0248
52	0.5485	142	0.1940	232	0.0686	322	0.0243
54	0.5360	144	0.1895	234	0.0670	324	0.0237
56	0.5237	146	0.1852	236	0.0655	326	0.0232
58	0.5118	148	0.1810	238	0.0640	328	0.0226
60	0.5001	150	0.1768	240	0.0625	330	0.0221
62	0.4887	152	0.1728	242	0.0611	332	0.0216
64	0.4775	154	0.1689	244	0.0597	334	0.0211
66	0.4666	156	0.1650	246	0.0583	336	0.0206
68	0.4559	158	0.1612	248	0.0570	338	0.0202
70	0.4455	160	0.1576	250	0.0557	340	0.0197
72	0.4354	162	0.1540	252	0.0544	342	0.0193
74	0.4254	164	0.1504	254	0.0532	344	0.0188
76	0.4157	166	0.1470	256	0.0520	346	0.0184
78	0.4062	168	0.1436	258	0.0508	348	0.0180
80	0.3969	170	0.1404	260	0.0496	350	0.0176
82	0.3879	172	0.1372	262	0.0485	352	0.0172
84	0.3790	174	0.1340	264	0.0474	354	0.0168
86	0.3704	176	0.1310	266	0.0463	356	0.0164
88	0.3619	178	0.1280	268	0.0453	358	0.0160
90	0.3536	180	0.1251	270	0.0442	360	0.0156

Determine the number of days that have elapsed between the assay date on your source holder and today's date — find that number of days in the age column and the associated decay factor. Multiply the original source activity by the decay factor to compute the current source strength.

CONTAMINATION CONTROL PROCEDURE

As a shipper of radioactive materials you are required by Department of Transportation regulation Title 49CFR 173.393 (n) (9) to determine that the external radiation and contamination levels are within allowable limits before you place a package into interstate commerce. This applies to return shipments of Iodine-125 source holder heads. D.O.T. CFR 173.397 states the maximum permissible levels for contaminants averaged over any area of 300 square centimeters:

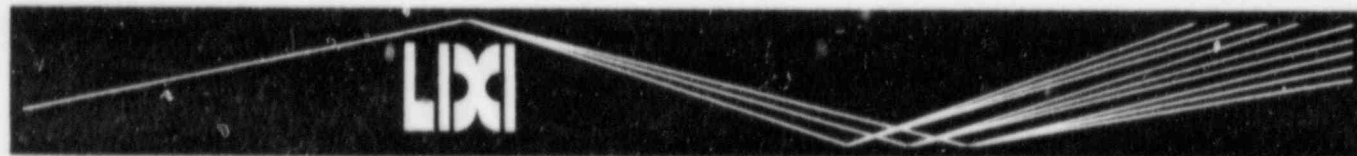
CONTAMINANT	MAXIMUM PERMISSIBLE LEVEL	
	uCi/Cm ²	dis/min/Cm ²
Iodine Beta-Gamma Emitting Radionuclides	10 ⁻⁴	220

$\text{uCi/Cm}^2 \times 10^{-4} = 10 \text{ nanocuries per square centimeter} = 220 \text{ disintegrations per minute per square centimeter.}$

In assessing the surface contamination of a package, a sufficient number of measurements must be taken in the most appropriate locations so as to yield a representative assessment of the contamination situation. The average amount of removable (non-fixed) radioactive contamination may be determined by wiping the external surface of the package with an absorbent material, using moderate pressure, and then measuring the activity on the wiping material. If the measured activity per square centimeter does not exceed 10 percent of the levels prescribed above, it may be assumed that those levels have not been exceeded.

If your organization does not have a contamination control procedure then you may use the following method for Type A shipments of Iodine-125 source holder heads.

1. Using the Stan Huber Model LT-2 Leak Test Kit (as registered with the NRC Product Certification Branch) provided with the Lixscope, remove the alcohol swab from the sealed packet (Do not use the Q-tips).
2. While wearing a plastic glove wipe approximately 300 sq. cm (46 sq. inches) of the package surface.
3. Place the swab into the plastic envelope provided and survey for gross contamination as instructed.
4. Place the plastic envelope into the kit envelope, fill out the required information and mail to Stan Huber Consultants or send it to any local company that provides this service.
5. Place the source holder head package into a storage area where it is quarantined from contact with any radioactive material.
6. When you receive the negative wipe test report you may ship the carton.
7. If you receive a positive report follow the disposal procedure in your NRC license or call Lixi, Inc. Customer Service for assistance (312) 620-4646.



Lixi, Inc.
1438 Brook Drive
Downers Grove, Illinois 60515

Phone (312) 620-4646
Telex 6871077DKROB
TWX 910-991-3903 ERI DOVE

STAN A. HUBER CONSULTANTS, INC.

-- 235 ESSEX LANE -- NEW LENOX IL 60451 -- PHONE (815) 722-8009 --

SEALED GAMMA/BETA SOURCE - LEAK TEST CERTIFICATE

LEAK TEST REPORT DATE: 9-6-84
FACILITY: ACCENT ON FEET
NEW YORK NY
FACILITY RADIOACTIVE MATERIALS LICENSE NO.: 2869
-- NRC ☒ STATE

SOURCE IDENTIFICATION

RADIONUCLIDE: I-125
CALIBRATION DATE: ACTIVITY: 500 MCI
MODEL NO.: MANUFACTURER: LIXISCOPE
SERIAL NO.: 2078

ASSAY RESULTS:

	GROSS COUNTS/MIN	NET COUNTS/MIN	UCI
WET WIPE	179	0	$< 9.1E-07$
DRY WIPE	184	0	$< 9.1E-07$

BACKGROUND @ TIME OF ASSAY 186 CPM

ANALYSIS OF RESULTS:

SOURCE IS NOT LEAKING AT THIS TIME.
REMOVABLE CONTAMINATION IS LESS THAN $5 \times 10E-3$ UCI.

NEXT LEAK TEST DUE: 2-85

LEAK TEST PERFORMED BY: LOUIS SHURE

DATE:

ANALYSIS PERFORMED BY: STAN A. HUBER *SH*

DATE: 9-4-84



STAN A. HUBER CONSULTANTS, INC.

235 ESSEX LANE □ NEW LENOX, ILLINOIS 60451

(815) 722-8009

INVOICE
NO.

6469

INVOICE
DATE

September 7, 1984

Accent on Feet
631 Park Ave.
New York, NY 10021

Attn; Louis Shure

NET 30 DAYS

DESCRIPTION

AMOUNT

PROFESSIONAL SERVICES:

Semi-annual leak test of one (1) sealed source.

\$15.00

WIPE PERFORMED BY LOUIS SHURE, RECEIVED BY MAIL ON 8-25-84.
ANALYSIS PERFORMED BY STAN A. HUBER, 9-4-84.

8424
9/15/84

Foot Rehabilitation Services
ACCENT ON FEET
DR. A. LOUIS SHURE, DIRECTOR
631 PARK AVENUE
NEW YORK, N.Y. 10021

REMITTANCE ADVICE					

1-12 188
210

8424

PAY

Fifteen + 00/100

DOLLARS

TO THE ORDER OF	DATE	DESCRIPTION	CHECK NO.	ACCT. NO.		CHECK AMOUNT
				SUB	GEN	
<i>Stan A Huhner Consultants</i>	<i>9/18/84</i>	<i>Superscope</i>	<i>8424</i>			<i>15 00</i>

235 Essex Lane

New Lenox Ill. 60451

CHEMICAL BANK
1121 MADISON AVENUE, NEW YORK, N.Y. 10028

⑈008424⑈ ⑆021000128⑆ 186⑈ 103573⑈

INSPECTION REPORT — NOTICE OF VIOLATION

PG. 1 OF 1

OWNER LOUIS SHURE DPM	D/B/A -	C.C. NO.
ADDRESS 631 PARK AVE	BORO MANHATTAN 10021	PERMIT NO.
BUREAU R	PROGRAM RE	DATE 2/1/84

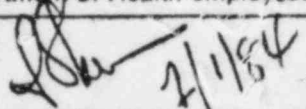

ITEM
NUMBER

DESCRIPTION OF VIOLATIONS

NO 4147

LIXISCOPE - Beam confined to
primary barriers

NOTICE: Department of Health employees must show identification on request.

RECEIVED BY  2/1/84	SIGNATURE & BADGE # Frank Strauss #15	SUPERVISOR'S SIGNATURE 	DATE
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PENALTY FOR FALSIFICATION: Falsification of any statement made herein is an offense punishable by a FINE of not more than \$500 or not more than 60 days imprisonment or both. — NYC ADMINISTRATIVE CODE, SEC 1151-9.0.

MATERIALS DATA INPUT—INDUSTRIAL, MEDICAL, SOURCE/SPECIAL NUCLEAR

A. TYPE OF ACTION AND IDENTIFICATION CODES

<input type="checkbox"/> NEW LICENSE	<input type="checkbox"/> AMENDMENT TO RENEW LICENSE	<input type="checkbox"/> AMENDMENT TO TERMINATE	<input checked="" type="checkbox"/> VOID	DOCKET NUMBER	MAIL CONTROL NUMBER	CHANGE NAME/ADDRESS ("X" box)
<input checked="" type="checkbox"/> NEW LICENSE AND NEW LICENSEE	<input type="checkbox"/> OTHER AMENDMENT	<input type="checkbox"/> CLERICAL CHANGE NO AMENDMENT		030-22263	18360	<input type="checkbox"/>

B. INDICATIVE INFORMATION

INDIVIDUAL LICENSEES	NAME (Last, First, Middle)	NAME (Last, First, Middle)
	NAME (Last, First, Middle)	NAME (Last, First, Middle)
	NAME (Last, First, Middle)	NAME (Last, First, Middle)
ORGANIZATION LICENSEES	ORGANIZATION NAME (Alphabetic Sequence) Ambulatory Foot Rehabilitation Center	
	DEPARTMENT OR BUREAU	
ADDRESS	BUILDING, STREET 625 Anderson Avenue	CITY, STATE, ZIP CODE Ft. Lee NJ 07024
6	TYPE OF APPLICANT	U.S. GOVERNMENT AGENCY INDIVIDUAL LICENSEE ORGANIZATIONAL LICENSEE
	DATE REQUEST RECEIVED	11/02/84
	INSTITUTION CODE	23492
	PENDING PROG. CODE	03225
SECONDARY PROGRAM CODES (As required)		ACTUAL PROG. CODE
#1		#2
#3		#4
#5		
LICENSE NUMBER		EXPIRATION DATE
DATE LICENSE ISSUED OR ACTION COMPLETED		JUN 20 1985

C. STATISTICAL INFORMATION

MEDICAL CATEGORY:	FOR HUMAN USE ONLY	FOR HUMAN AND NONHUMAN USE	FOR NONHUMAN USE ONLY			
POSSESSION OF THE MATERIAL IS AUTHORIZED IN ONE OF THE FOLLOWING AREAS						
AND/OR IN THE STATE(S), TERRITORY(IES), COUNTRY CHECKED (At right)	SAME AS "STATE" IN ADDRESS		ALL STATES		ALL NON-AGREEMENT STATES	
	AL ALABAMA	GA GEORGIA	MD MARYLAND	NJ NEW JERSEY	SC SOUTH CAROLINA	WY WYOMING
	AK ALASKA	HI HAWAII	MA MASSACHUSETTS	NM NEW MEXICO	SD SOUTH DAKOTA	
	AZ ARIZONA	ID IDAHO	MI MICHIGAN	NY NEW YORK	TN TENNESSEE	AS AMERICAN SOMOA
	AR ARKANSAS	IL ILLINOIS	MN MINNESOTA	NC NORTH CAROLINA	TX TEXAS	CZ CANAL ZONE
	CA CALIFORNIA	IN INDIANA	MS MISSISSIPPI	ND NORTH DAKOTA	UT UTAH	GU GUAM
	CO COLORADO	IA IOWA	MO MISSOURI	OH OHIO	VT VERMONT	PR PUERTO RICO
	CT CONNECTICUT	KS KANSAS	MT MONTANA	OK OKLAHOMA	VA VIRGINIA	VI VIRGIN ISLANDS
	DE DELAWARE	KY KENTUCKY	NE NEBRASKA	OR OREGON	WA WASHINGTON	
	DC WASHINGTON, DC	LA LOUISIANA	NV NEVADA	PA PENNSYLVANIA	WV WEST VIRGINIA	CN CANADA
	FL FLORIDA	ME MAINE	NH NEW HAMPSHIRE	RI RHODE ISLAND	WI WISCONSIN	

D. POSSESSION LIMITS OF SOURCE AND SPECIAL NUCLEAR MATERIALS AND TRITIUM

SOURCE MATERIAL CEILING	G GRAMS	SNM CEILING	G GRAMS	IF FOR POWER REACTOR					
	Kg KILOGRAMS		Kg KILOGRAMS	("X" here)					
*MATERIAL	AMOUNT	UNIT	CONFIG	ENRICH	*MATERIAL	AMOUNT	UNIT	CONFIG	ENRICH
US - U235		G	S				G	S	
		Kg	UNS				Kg	UNS	
		G	S				G	S	
U3 - U233		Kg	UNS				Kg	UNS	
		G	S				G	S	
PU - Plutonium		Kg	UNS				Kg	UNS	
		G	S				G	S	
UR - Uranium		Kg	UNS				Kg	UNS	
		G	S				G	S	
TH - Thorium		Kg	UNS				Kg	UNS	
		G	S				G	S	
		Kg	UNS				Kg	UNS	
		G	S				G	S	
		Kg	UNS				Kg	UNS	
		G	S				G	S	
H3 - Tritium		CURIES			RIS CODES				
		MILLCURIES							
		MICROCURIES							

*Use two-digit codes.

S: SEALED

UNS: UNSEALED