License No. 08-03075-07
Docket No. 030-01321
Control No. 07493

SEP 23 1982

Howard University Radiation Safety Committee
c/o Office of Radiation Safety
Howard University
ATTN: George A. Ferguson, Ph.D., Chairman
Freedmen's Square - Annex II, Room 211
Washington, D.C. 20059

Gentlemen:

This is in reference to your application received April 20, 1981 to renew License No. 08-03075-07. In order to continue our review, we need the following additional information:

1. Because of our delay in processing your renewal application, we request that you review your submittal for any updating that may be required and provide the necessary revisions and/or additions. It is particularly important to update the individual users of licensed material and the members of your Hospital Radiation Protection Committee.

2. Please confirm that your radiation survey and monitoring instruments will be calibrated by Howard University in accordance with procedures provided in License No. 08-00386-19.

3. A proposed rule change for 10 CFR 35 would require that the membership of your hospital's Radiation Protection Committee include a representative of the nursing staff. It is expected that this change will be enacted in the near future. Please provide the name and title of the individual who will fulfill this need.

4. Please identify the reference standards that you will use to perform calibration procedures for your dose calibrator. In order to follow the procedures in Appendix D, Section 2 of Regulatory Guide 10.8 (enclosed), you will need reference standards of at least high and low energy (e.g., cesium-137 and cobalt-57). In addition, it is recommended that you use a reference standard of intermediate energy (e.g., barium-133).

   The source activity levels should approximate those levels normally encountered in clinical use (e.g., cobalt-57, one millicurie or more; cesium-137, one hundred microcuries or more, etc.). In identifying the sources that you will use, state the nuclide activity and calibration accuracy.

5. Your dose calibrator linearity tests must include the maximum activity that is assayed in the dose calibrator (i.e., the first elution from a new Tc-99m generator). Please confirm.

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6. Please confirm that personnel training will be provided initially and annually thereafter on a refresher basis.

7. Ancillary personnel (clerical, nursing, housekeeping, security, etc.) whose duties may require them to work in the vicinity of radioactive material (whether escorted or not) need to be informed about radiation hazards and appropriate precautions. Outline your method to assure that these employees receive the necessary instruction.

8. Submit the precautionary measures and the bioassay procedures that employees will follow when administering therapeutic doses to patients, or confirm that the iodine-131 used will only be received and administered as capsules. Regulatory Guide 8.20 (enclosed) describes bioassay procedures we find acceptable.

9. We require for license renewal that you submit a complete xenon-133 protocol that provides all of the information requested in Appendix M of Regulatory Guide 10.8 (enclosed). We recommend that you begin with Item 1.a and provide the information required under every numbered and lettered item in the appendix. You may resubmit previous material if it is currently applicable.

10. As of August 15, 1980, our medical licensees were required to submit an ALARA program with any significant amendment, renewal, or new byproduct material license application. Consequently, you will need to submit the program which your institution will follow in order to maintain occupational exposures as low as reasonably achievable. A copy of our model ALARA program is provided as Appendix Q of Regulatory Guide 10.8 (enclosed). Your medical institution should adopt this program or develop an equivalent alternative program for review by the NRC. If necessary for clarification or emphasis, you are encouraged to add explanatory text to the model program. Once accepted, your program will be incorporated as a condition of your NRC license.

We will continue our review of your application upon receipt of this information. Please reply in duplicate and refer to Control No. 07493.

Sincerely,

Original Signed By:
Phillip C. Jerman

Phillip C. Jerman
Materials Program Section No. 2
Division of Engineering and Technical Programs

Enclosures:
1. Regulatory Guide 8.20
2. Regulatory Guide 10.8

OFFICE	RI:FCMLB	RI:FCMLB					
SURNAME	Jerman/ltm	Glenn					
DATE	9/21/82	9/23/82					