

MATERIALS LICENSE

Amendment No. 29

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee 1. Medical College of Pennsylvania and Hahnemann University/Center City Campus Radiation Safety Office, MS 102 2. Broad and Vine Streets Philadelphia, Pennsylvania 19102-1192	In accordance with the letter dated January 5, 1995, 3. License Number 37-00467-34 is amended in its entirety to read as follows: 4. Expiration Date June 30, 1992 (Extended) 5. Docket or Reference No. 030-02959/37-28165-01	
6. Byproduct, Source, and/or Special Nuclear Material A. Any byproduct material with Atomic Nos. 1-83 with a half-life less than or equal to 120 days B. Carbon 14 C. Hydrogen 3 D. Phosphorus 32 E. Iodine 131 F. Technetium 99m G. Gold 198 H. Sulfur 35 I. Iodine 125 J. Chromium 51 K. Iridium 192 L. Strontium 90 M. Iodine 125 N. Molybdenum 99 O. Cesium 137 P. Calcium 45 Q. Stontium 90 R. Strontium 90 S. Nickel 63	7. Chemical and/or Physical Form A. Any B. Any C. Any D. Any E. Any F. Any G. Any H. Any I. Any J. Any K. Stainless Steel Encased seeds in Nylon Ribbon L. Sealed Source (Tracer lab Model RA-1) M. Seeds N. Molybdenum 99/ Technetium 99m Generators O. Sealed sources (needles and cells) P. Any Q. Sealed source (CESIO, S.R.O., Radiova Model No. MSR 0.100) R. Sealed Sources for Gas Chromatography S. Plated sources or foils	8. Maximum Amount that Licensee May Possess at Any One Time Under This License A. 100 millicuries each radionuclide with a total possession limit of 2 curies B. 25 millicuries C. 400 millicuries D. 500 millicuries E. 750 millicuries F. 10 curies G. 500 millicuries H. 500 millicuries I. 500 millicuries J. 500 millicuries K. 2 curies L. 50 millicuries M. 5 curies N. 10 curies O. 2 curies P. 3.5 millicuries Q. 10 millicuries R. 200 millicuries S. Not to exceed 20 millicuries per foil and 200 millicuries total

9610160222 960807
PDR ADOCK 03002959
C PDR

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License number

37-00467-34

Docket or Reference number

030-02959/37-28165-01

Amendment No. 29

(6., 7., and 8. Continued)

- | | | |
|---|--|--|
| 6. Byproduct, source, and/or special nuclear material | 7. Chemical and/or physical form | 8. Maximum amount that licensee may possess at any one time under this license |
| T. Ruthenium 106/Rhodium 106 | T. Sealed source (Akademie der Wissenschaften der DDR Models CCA, CCB, COB, COC, CCC, CCZ, CGD, CIA, CIB OR CIB-2) eye applicators | T. Not to exceed 1 millicurie per applicator, with a total possession limit 20 millicuries |
| U. Palladium 103 | U. Seeds | U. 500 millicuries |

9. Authorized use

- A. through Q. Medical research, diagnosis, and therapy; research and development as defined in 10 CFR 30.4(q). Tracer studies in laboratory animals and instructional purposes.
- R. and S. For use in electron capture detectors in gas chromatographs which are distributed under a license issued by the Nuclear Regulatory Commission or an Agreement State.
- T. and U. For use in the treatment of eye tumors.
- U. For use in interstitial treatment of cancer.

CONDITIONS

10. Licensed material may be used at the licensee's facilities at Hahnemann Medical College and Hospital, 320 North Broad Street, Philadelphia, Pennsylvania. Cobalt 60, Strontium 90 for treatment of superficial eye conditions, Iodine 125 seeds, Iridium 192 seeds, Palladium-103 seeds, and Ruthenium 106/Rhodium 106 eye applicators may be used at the Wills Eye Hospital, 9th and Walnut Streets, Philadelphia, Pennsylvania. Licensed material included in 10 CFR 35.200 may be used at the licensee's facilities at Harvard Square Shopping Center, 6579 Roosevelt Boulevard, Philadelphia, Pennsylvania.
11. The Radiation Safety Officer for this license is Theodore Villafana, Ph.D.
12. A. Licensed material shall be used by, or under the supervision of, individuals designated by licensee's Radiation Safety Committee, William Van Decker, M.D., Chairman.
- B. The licensee's Radiation Safety Committee may permit a physician to use byproduct material for medical use, research, and development. The physician must meet the appropriate training and experience criteria in 10 CFR Part 35, Subpart J. The licensee's Radiation Safety Committee may make case-by-case exceptions to these criteria.

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License number

37-00467-34

Docket or Reference number

030-02959/37-28165-01

Amendment No. 29

(Continued)

CONDITIONS

13. Experimental animals administered licensed materials or their products shall not be used for human consumption.
14. In lieu of using the conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203(a)(1), of 10 CFR Part 20, the licensee is hereby authorized to label detector cells and cell baths, containing licensed material and used in gas chromatography devices, with conspicuously etched or stamped radiation caution symbols without a color requirement.
15. Sealed sources or detector cells containing licensed material shall not be opened or sources removed from source holders or detector cells by the licensee.
16. The licensee shall not acquire licensed material in a sealed source or in a device that contains a sealed source unless the source or device has been registered with the Nuclear Regulatory Commission under 10 CFR 32.210 or with an Agreement State.
17. The licensee may transport licensed material in accordance with the provisions of 10 CFR 71, "Packaging and Transportation of Radioactive Material."
18. Pursuant to Sections 20.106(b) and 20.302 of 10 CFR Part 20, the licensee is authorized to dispose of licensed material by incineration provided the gaseous effluent from incineration does not exceed the limits specified for air in Appendix B, Table II, 10 CFR Part 20. Ash residues may be disposed of as ordinary waste provided appropriate surveys pursuant to Section 20.201 of 10 CFR Part 20 are made to determine that concentrations of licensed material appearing in the ash residues do not exceed the concentrations (in terms of microcuries per gram) specified for water in Appendix B, Table II, 10 CFR Part 20.
19. Pursuant to Section 20.105(a) of Title 10, Chapter 1, Code of Federal Regulations, Part 20 "Standards for Protection Against Radiation," and in reliance of statements, procedures and representations made by the licensee in letters dated November 15, 1982 and February 16, 1983 the following maximum radiation levels are hereby authorized in the following unrestricted areas:

Maximum Radiation Level

450 millirems in any
seven consecutive
days - No individual
to exceed 500 millirems
per year

Unrestricted Area

Rooms and hallways
adjoining brachytherapy
patient rooms employing
iridium 192 seeds

20. Survey meters shall be calibrated in accordance with the procedures set forth in Appendix D, Section 1 of Regulatory Guide 10.8: "Guide for the Preparation of locations for Medical Programs," January, 1979.
21. Notwithstanding the requirements of 10 CFR 35.49 (a) and (b), the licensee may use for medical use any byproduct material or reagent kit for which the Food and Drug Administration has accepted a "Notice of Claimed Investigational Exemption for a New Drug" (IND).

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License number

37-00467-34

Docket or Reference number

030-02959/37-28165-01

Amendment No. 29

(Continued)

CONDITIONS

22. Notwithstanding the requirements of 10 CFR 35.92 (a), the licensee may hold byproduct material with a physical half-life of less than 100 days for decay-in-storage.
23. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material so that at no time is a quantity of radioactive material possessed in excess of a quantity which requires decommissioning funding in accordance with 10 CFR 30.35(d), 10 CFR 40.36(b) or 10 CFR 70.25(d).
24. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated March 23, 1979
 - B. Letter dated February 22, 1982
 - C. Letter dated March 23, 1982
 - D. Letter dated November 15, 1982
 - E. Letter dated February 16, 1983
 - F. Letter dated October 28, 1983
 - G. Letter dated June 29, 1984
 - H. Letter dated September 6, 1984
 - I. Letter dated October 13, 1986
 - J. Application dated March 24, 1987
 - K. Letter dated July 1, 1987
 - L. Letter dated April 22, 1988
 - M. Letter dated March 30, 1989
 - N. Letter dated May 17, 1989
 - O. Letter dated December 11, 1989
 - P. Letter dated August 15, 1990
 - Q. Letter dated February 4, 1991
 - R. Letter dated June 21, 1991
 - S. Letter dated August 18, 1992
 - T. Letter dated March 16, 1993
 - U. Letter dated November 29, 1994 except Item 2
 - V. Letter dated February 2, 1995
 - W. Facsimile received May 2, 1995
 - X. Letter dated January 5, 1995

For the U.S. Nuclear Regulatory Commission

Original Signed By:

Thomas K. Thompson

By

Nuclear Materials Safety Branch
Region I

King of Prussia, Pennsylvania 19406

Date AUG - 7 1995

AUG - 7 1995

Alan Lieber, Vice President
Hahneman University
Radiation Safety Office, MS 102
Broad and Vine Streets
Philadelphia, Pennsylvania 19102-1192

Dear Mr. Lieber:

This refers to your license amendment request. Enclosed with this letter is the amended license.

Please review the enclosed document carefully and be sure that you understand and fully implement all the conditions incorporated into the amended license. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region I office, the Licensing Assistance Section, (610) 337-5093 or 5239, so that we can provide appropriate corrections and answers.

Thank you for your cooperation.

Sincerely,

Original Signed By:

Thomas K. Thompson, Sr. Health Physicist
Nuclear Materials Safety Branch
Division of Radiation Safety
and Safeguards

License No. 37-00467-34
Docket No. 030-02959
Control No. 121952

Enclosure:
Amendment No. 29

DOCUMENT NAME: R:\WPS\MLTR\L3700467.34

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	DRSS/RI		/		/				
NAME	thompson <i>TKT</i>								
DATE	08/07/95	08/	/95	08/	/95	08/	/95	08/	/95

OFFICIAL RECORD COPY ML 10

**MEDICAL
COLLEGE OF
PENNSYLVANIA AND
HAHNEMANN UNIVERSITY**

Vincent J. Cristofalo, Ph.D.
Vice Provost for Research

036-02959

Broad & Vine
Philadelphia, PA 19102-1192

2900 Queen Lane
Philadelphia, PA 19129
Telephone (215) 991-8460
FAX (215) 843-1192

January 5, 1995

Frank Costello
Chief, Medical Licensing
U.S. Nuclear Regulatory Commission, Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

Re: NRC License #37-00467-34 (Hahnemann)
NRC License #37-07438-15 (MCP)

Dear Sir/Madam:

This is a follow up of a previously submitted communication (copy enclosed as addendum A) notifying the NRC of the merger of the Medical College of Pennsylvania (MCP) and Hahnemann University (HU). In general, the merger will be such that all current licenses will be maintained as is with exception to the named RSO and the institution name.

In accordance with IN89-5, Rev 1 the following information is supplied:

1. The new name of the licensed organization is the "Medical College of Pennsylvania and Hahnemann University" (MCPHU). It is composed of the following campuses:

Center City Campus (formerly known as Hahnemann University)
East Falls Campus (formerly known as Medical College of PA)

Campus organization chart is shown as Addendum B. MCPHU is part of the Allegheny Health, Education and Research Foundation (AHERF) centered in Pittsburgh, Pennsylvania. AHERF is a non-profit organization.

A member of Allegheny Health,
Education and Research Foundation
Allegheny General Hospital
Medical College of Pennsylvania
and Hahnemann University
Medical College of Pennsylvania and
Hahnemann University Hospital System
St. Christopher's Hospital for Children

OFFICIAL RECORD COPY ML 10 REC'D IN LAS 6-39-95 JAN 6 1 1995

2. New Licensee Contacts

Radiation Safety Officer: Theodore Villafana, Ph.D.
Radiation Safety Office
Medical College of PA and Hahnemann
University
3300 Henry Avenue
Philadelphia, PA 19129
(215) 842-6066

Administrative Officer: Vincent J. Cristofalo, Ph.D.
Vice Provost for Research
Medical College of PA and Hahnemann
University
2900 Queen Lane
Philadelphia, PA 19129
(215) 991-8460

Chairman, Radiation
Safety Committee: William VanDecker, M.D.
Nuclear Cardiology Division
Medical College of PA and Hahnemann
University
3300 Henry Avenue
Philadelphia, PA 19129
(215) 842-6990

3. Authorized users will remain as before. Responsibility for all licensed activities will now be under the Office of the Provost of the University. An institutional Radiation Safety Officer is named and will be Theodore Villafana, Ph.D. Dr. Villafana is currently the RSO for the following NRC Licenses at MCP:

#37-07438-15 (Broad License)
#37-02562-01 (Medical License)
#SNM1996 (Special Nuclear Materials License)

Dr. Villafana will become (pending NRC approval) the institutional RSO covering all licenses of the merged institution. Mr. Kent Lambert presently the RSO for the Hahnemann University broad license will become the Center City Campus RSO, reporting to the institutional RSO.

Qualifications and credentials of Dr. Villafana are currently on file under the current MCP licenses. The overall breakdown of administrative authority is submitted as Addendum C.

4. Both campus entities in merged organization will continue license activities as previously authorized under current NRC licenses.
5. Merger between MCP and HU is a totally integrated one with the intent of making it one integral university. Both entities were non-profit organizations as will be the merged entity.

6. Planned changes in organization are outlined in item 3 above and in Addendum B.

There will be one Institutional Radiation Safety Committee with representation from both campuses including administrative, nursing and radiation safety personnel as well as representatives of major users.

The new Institutional Radiation Safety Committee will be composed of the following membership as appointed by the Provost of MCPHU:

William A. VanDecker, M.D., Chair	EF	Radiologic Sciences
Itzhak Fischer, Ph.D.	EF	Anatomy and Neurobiology
Angelo J. Pinto, Ph.D.	EF	Microbiology and Immunology
John J. LiPuma, M.D.	EF	Pediatrics
Bruce Ruggieri, Ph.D.	EF	Pathology & Laboratory Med
Joan M. Mack, M.D.	EF	Radiologic Sciences
Arnold Friedman, M.D.	EF	Radiologic Sciences
Simindokht Dadparvar, M.D.	CC	Radiologic Sciences
Seth N. Glick, M.D.	CC	Radiologic Sciences
Curtis T. Miyamoto, M.D.	CC	Radiologic Sciences
James F. Conroy, D.O.	CC	Medicine
Theodore Villafana, Ph.D.	EF	Radiation Safety Officer
Kent Lambert, M.S.	CC	Center City Campus RSO
Allan Chackman	EF	Rep, Human Resources
Susan Croushore	EF	Rep, Hospital Administration
Alan Lieber	CC	Rep, Hospital Administration
Vincent J. Cristofalo, Ph.D.	U	Vice Provost, Research
Pamela S. Callahan	U	Assistant Provost, Research
Patricia Mee, R.N.	EF	Rep, Nursing Office
To Be Named	CC	Rep, Nursing Office
Monica Dent	EF	Rep, Surgery

Note: EF = East Falls Campus CC = Center City Campus
U = Medical College of PA and Hahnemann University
Administration

A subcommittee will be designated at each campus to make recommendations to the institutional committee where all final decisions will reside. Radiation Safety Committee organization shown in Addendum D.

The Institutional Radiation Safety Committee will report both to the University as well as the medical executive boards of the respective hospitals.

Locations of use will be as specified previously at each campus. There will be no changes in equipment or operating or emergency procedures.

7. There will be no changes in use, possession, location, or storage of licensed materials as specified in current NRC licenses at either campus.
8. The following NRC license amendments will be required:
 - A. Change Radiation Safety Officer to Theodore Villafana, Ph.D. on the following licenses:

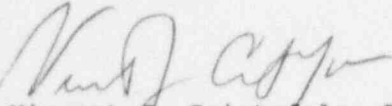
License #37-00467-34
License #SNM1369
 - B. Change name to Medical College of Pennsylvania and Hahnemann University/Center City Campus on NRC License #37-00467-34

Change name to Medical College of Pennsylvania and Hahnemann University/East Falls Campus on NRC License #37-07438-15
 - C. Change name of Chairman, Radiation Safety Committee, to Dr. William A. VanDecker on NRC License #37-00467-34. Dr. VanDecker's credentials are listed under current NRC License #37-07438-15.
9. The status of all surveillance items and records (e.g. calibrations, leak tests, surveys, inventories, and accountability requirements) are current and will remain so.
10. There will be no decommissioning of any of the current facilities or licensed activities. All responsibilities concerning public dose, waste disposal, radioactive spills and license amendments have been taken over by the merged MCPHU entity.
11. No decommissioning will occur and there is no need for decontamination action at this time.
12. Refer to item #11.
13. MCPHU agrees to abide by all commitments and representations previously made to the NRC as indicated on current NRC licenses. These commitments include full responsibility for all open inspection items and enforcement actions. All liability for either campus will be assumed by the merged MCPHU.

There are no contamination problems at either the Center City or the East Falls Campus sites.
14. The merged MCPHU is aware of all NRC open items and enforcement actions and assumes all responsibility thereof.
15. MCPHU agrees to abide by all constraints, conditions, requirements, representations and commitments identified in all existing NRC licenses on all campuses.

At present we intend to continue with the existing multiple NRC licenses. Our intent, however, is to combine these licenses at a later date after study by our Radiation Safety Office concerning making all procedures uniform between campuses and producing a uniform Radiation Safety Manual. When ready, authorization for this will be filed with the NRC.

Yours truly,



Vincent J. Cristofalo, Ph.D.
Vice Provost for Research

cc: Donald Kaye, M.D.

President and CEO - Medical College of Pennsylvania and Hahnemann
University Hospital Systems

Susan Croushore

Vice President, Operations - Medical College of Pennsylvania Hospital

Shelley Gebar

Executive Director and CEO - Hahnemann University Hospital

**ALLEGHENY
HEALTH,
EDUCATION AND
RESEARCH
FOUNDATION**

Nancy A. Wynstra
Executive Vice President
and General Counsel
Legal Department

Accidentum A

October 7, 1994

Fifth Avenue Place, Suite 2900
120 Fifth Avenue
Pittsburgh, PA 15222-3009
Telephone (412) 359-6644

100 West Laurel Avenue
Cheltenham, PA 19012-2098
Telephone (215) 663-3412

Ronald Mellamy
Chief of Nuclear Materials
Safety Branch
Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

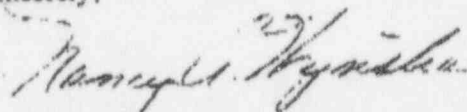
RE: Consolidation of Hahnemann University and Allegheny Health, Education and Research Foundation

Please accept this letter as notice that effective July 1, 1994, Allegheny Health, Education and Research Foundation became the sole corporate member of Hahnemann University, and the name of Hahnemann University has been changed to The Medical College of Pennsylvania & Hahnemann University.

The Medical College of Pennsylvania and Hahnemann University is a Pennsylvania nonprofit corporation.

Committees for oversight of nuclear safety will continue within The Medical College of Pennsylvania & Hahnemann University and any changes in membership of committees will be forwarded to the appropriate federal and state offices. In the meantime, if you have any questions, or if specific additional documentation or information is required, please feel free to contact Patricia Koehler, Associate General Counsel, at (412) 359-6111.

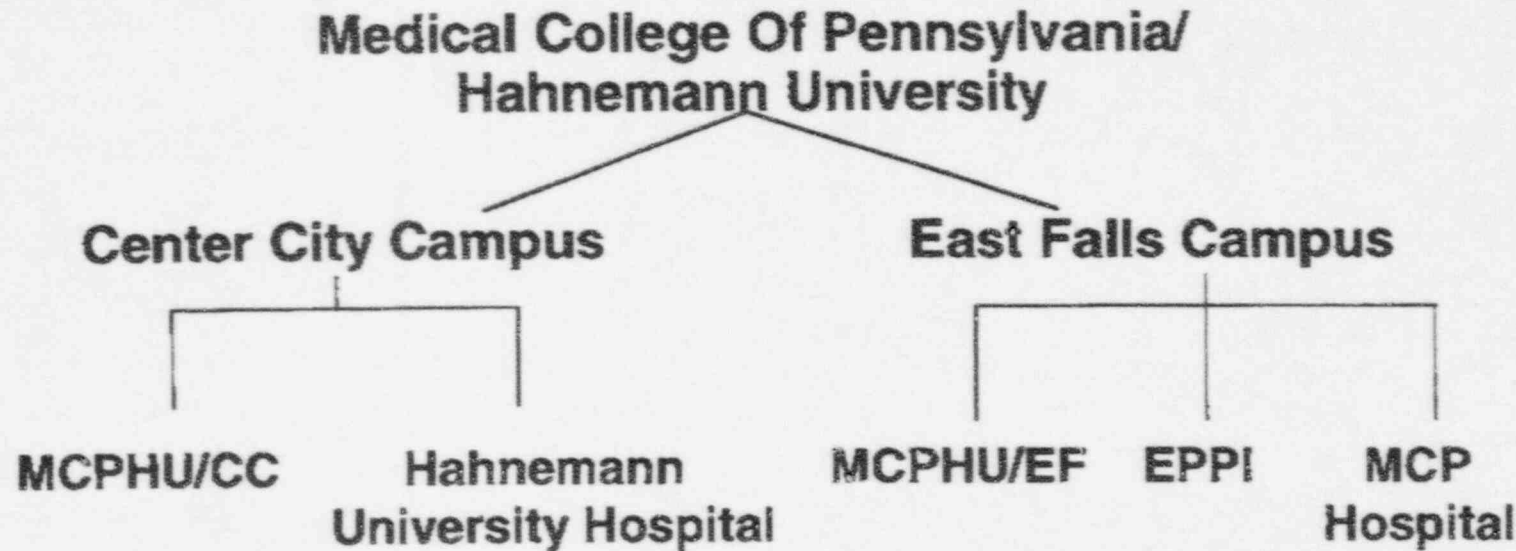
Sincerely,



Nancy A. Wynstra
Executive Vice President and
General Counsel

NAW:aaa

**Medical College Of Pennsylvania/
Hahnemann University
Campus Organization**



- Notes: 1. MCPHU/CC = Medical College of Pennsylvania and Hahnemann University, Center City Campus
2. MCPHU/EF = Medical College of Pennsylvania and Hahnemann University, East Falls Campus
3. EPPI = Eastern Pennsylvania Psychiatric Institute.
4. MCP = Medical College of Pennsylvania
5. Distance between Buildings on East Falls Campus is about 3 city blocks
6. Distance between campuses is about 7 miles. They are connected by limited access highways. Health Physicist to be stationed at each campus

Added
and
un
B

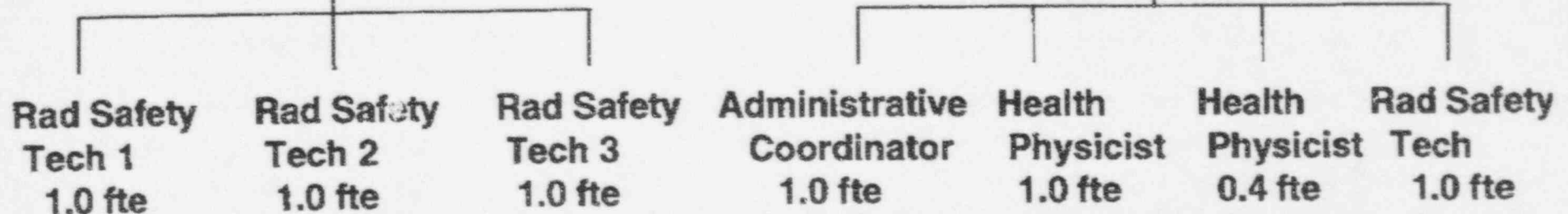
**Medical College Of Pennsylvania/
Hahnemann University
Radiation Safety Office Organization**

**Vice Provost
Vincent Cristofalo PhD**

**Institutional Radiation Safety Officer
Theodore Villafana PhD**

**Center City Campus
Kent Lambert MS,
Campus RSO**

**East Falls Campus
Clinical & Research Campuses
Theodore Villafana PhD, RSO**



Note: In addition to the above personnel there is an additional part time radiation safety technician available.(approximately 0.30 FTE)

**Medical College Of Pennsylvania/
Hahnemann University
Radiation Safety
Committee Organization**

**Radiation Safety Committee Chairman
William VanDecker MD**

**Institutional RSO
Theodore Villafana PhD**

**Center City Campus
Sub-Committee**

**East Falls Campus
Sub-Committee**

Note: The radiation Safety Committee is a university appointed committee, responsible administratively to the provost of the university.

It is charged with the responsibility of overseeing all uses of radioactive materials as well as all uses of electronically produced x-rays.

The sub-committees serve in an advisory capacity only, all final decisions will be made by the parent committee.

(FOR LFMS USE)

INFORMATION FROM LTS

BETWEEN:

LICENSE FEE MANAGEMENT BRANCH, ARM
AND
REGIONAL LICENSING SECTIONS

PROGRAM CODE: 02110

STATUS CODE: 2

FEE CATEGORY: 7B

EXP. DATE: 19920630

FEE COMMENTS:

DECOM FIN ASSUR RECD: N

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED

APPLICANT/LICENSEE: HAHNEMANN UNIVERSITY

RECEIVED DATE: 950629

DOCKET NO: 3002959

CONTROL NO.: 121952

LICENSE NO.: 37-00467-34

ACTION TYPE: AMENDMENT

2. FEE ATTACHED

AMOUNT: -----

CHECK NO.: -----

3. COMMENTS

Reference 121951, 121953

SIGNED
DATE

Rebecca J. Brown
7/7/95

B. LICENSE FEE MANAGEMENT BRANCH (CHECK WHEN MILESTONE IS ENTERED, 4/1)

1. FEE CATEGORY AND AMOUNT: *7B*

2. CORRECT FEE PAID. APPLICATION MAY BE PROCESSED FOR:

AMENDMENT

RENEWAL

LICENSE

3. OTHER

SIGNED
DATE

RECEIVED BY LFMS	
DATE	LOG
July 2	I (SS)
By	BAR
Date Completed	

Also see
121951 &
121952