

File

MAY 15 1985

St. Anthony Medical Center
ATTN: Peter G. Rogan, Ph.D.
President and Chief
Executive Officer
Main and Franciscan Road
Crown Point, IN 46307

Gentlemen:

We have reviewed your application received October 23, 1984 requesting renewal of your license and find that we will need additional information as follows:

Please note that 10 CFR Part 35 has been revised effective October 12, 1982. This revision requires a representative of the nursing staff to be on the Medical Isotopes Committee. In view of this new requirement, you should appoint a member of your nursing staff to your Medical Isotopes Committee immediately.

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 instructions. Confirm that this instruction will be given both initially and annually thereafter on a refresher basis.

Item 14 of your application appears to exempt certain packages containing licensed material from safe opening procedures. There are no exemptions from safe opening procedures in 10 CFR 20.205. Basically, 10 CFR 20.205 is divided into four parts:

- a. Paragraph (b) refers to monitoring for surface contamination upon receipt of packages containing licensed material. This contains the exemption quoted in Item 14 of your application.
- b. Paragraph (d) refers to procedures for safely opening packages containing licensed material. There are no exemptions in Paragraph (d).

Appendix F of Regulatory Guide 10.8 contains a method that is acceptable to the NRC staff for implementing the regulation in 10 CFR 20.205(d), which applies to all packages containing licensed material. You cannot use the exemptions in 10 CFR 20.205(b), which apply to receiving packages, as a substitute for the procedures in Appendix F which apply to opening packages.

Regard the use of Xenon-133 gas, please submit the following:

- a. A diagram of your facility showing all supply vents and exhaust vents including air flow rates. The diagram submitted in Item 11 does not appear to have this information.

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MAY 15 1985

- b. You should measure the airflow rates in the ventilation systems for xenon-133 at least semiannually to determine that system performance meets the specifications stated in your letter. Please confirm.
- c. Expand your emergency procedures to include a physical survey of the area before personnel are allowed to reenter the room after an accidental release.
- d. Indicate at what frequency the gas trap will be checked for saturation.

We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, and refer to Control Number 77675.

Sincerely,

Original Signed By
James R. Mullauer
Materials Licensing Section

RIII

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