

Dr. Rafael Fossas D.

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San Juan, May 22, 1985

U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W. - Suite 2900
Atlanta, Georgia 30303

Ref: Renewal Lic. No. 52-19025-01
Program Code : 02210

Dear Sirs:

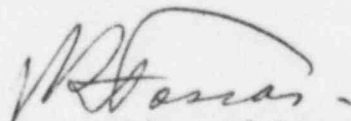
In answer to your Notice of Expiration dated 02-05-85, I am hereby requesting renewal of my Lic. No. 52-19025-01 for the use of radioactive material in humans.

In support of this request, please find enclosed the document on the current License and Program reviews and the proper fee (\$580.00) for the renewal of a License Category 7C as stated in 10 CFR-170.31.

Hoping to complete all the information required for the renewal of my License, I remain,

Sincerely yours,

Rafael Fossas, M.D.



Enclosures: Document on the Current Lic. and Program reviews Check for \$580.00

License Fee Information
on next page 5/21/85
letter

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52-19025-02 PDR

Rec'd 5/29/85
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REVIEW
OF
THE CURRENT LICENSE AND RADIATION PROTECTION PROGRAM

Ref.: Renewal Lic. No. 52-19025--01
Program Code: 02210
Notice of Expiration dated 02/05/85

1. Current License Review:

- a) Items 1 through 9 of the License remain unchanged, except Item 7:
Sealed Source (Nuclear Associates Model 67-851) has been changed for: Sealed Source (New England Nuclear Model NER-8090 - Capsule No. NB-1)
- b) Concerning personnel, Mr. Santiago Gómez (NRC Lic. 52-17420-01 works as the Radiation Physics Consultant of the Office and performs the Sr-90 sealed source leak test every six months.
- c) Facilities equipment are the same, and for security purposes the applicator, when not in use, is always being stored in a keyed cabinet located in the treatment room.

2. Review of the Applicator documents:

Unfortunately, no-copies of the documents submitted in the past, i.e. Application and letters, could be found in my files at the present time. But I can declare that attending instructions of my radiation Physics Consultant I have updated the Radiation Protection Program in the following way:

A. Use of the Applicator:

- a) The Beta Eye Applicator can only be handled by the authorized user when treatments are performed or by the radiation physics consultant when leak testing procedures are being made.
- b) During treatments, paramedical personnel stay away from the source in such a manner that the total dose received by any one of those employees shall not exceed the maximum permissible dose for the general public.

B. Rules for safely handling a Sr-90 Eye Applicator

(Ref.: Enclosure 2 - Information to be submitted when requesting possession and use of Sr-90 as Ophthalmic Applicator)

- a) Wear your personal dosimeter (s) if available whenever you handle the Sr-90 Eye Applicator.
- b) Remove the Sr-90 Eye Applicator from its secured storage location just before use. Do not leave it out any longer than necessary.
- c) After removing the Applicator from its storage location:
 - i. Do not touch the treatment end of the Applicator with your hands or other portion of your body.
 - ii. Always hold the Applicator by its handle.
 - iii. Except during the patient treatment, do not point the treatment end of the Applicator toward another person, especially toward the eyes.
- d) When the Applicator is to be sterilized, place on a flat surface, use a cotton swab, sponge or gauze dampened with a sterilizing agent, then wipe the treatment end of the Applicator across the swab, sponge or gauze. Do not sterilize by holding the swab or gauze in your hand.
- e) During treatment, hold the patient's eye lids open with tape or other device, not with your fingers.
- f) Immediately after treatment and/or resterilization, return the Sr-90 Eye Applicator to its storage container and to its secured location i.e. the keyed cabinet.

- g) Do not remove any metal or plastic inserts from the manufacturer-supplied storage container. These items are generally a part of the container's shielding. Removal of these items can lead to excessive and unnecessary radiation exposures.
- h) In event of apparent or probable damage to the source it shall immediately be placed into the storage container. The storage container shall be wrapped or placed into a plastic bag and secured. The cognizant radiation protection officer, regulatory agency, or the radiation physics consultant shall be contacted immediately for consultation and action.

C. Waste Disposal.

It is not foreseen any waste disposal in the proposed use and handling of the Sr-90 sealed source Eye Applicator. In the event of a serious damage to the Applicator, the final disposal will be performed by the manufacturer, i.e. New England Nuclear, or any other NRC Licensee specifically approved to handle and/or dispose this source.

3. Review of NRC regulations:

Recently concern of the NRC (IE Information Notice No. 84-43 6-7-84) about "Bremss" radiation levels around the Sr-90 Eye Applicators, has been discussed with the Radiation Physics Consultant, instantaneous readings were taken using a recently calibrated G.M. Survey Meter and the radiation levels recorded showed no significant radiation hazard for the user, Office personnel and general public. Radiation levels at one meter from the Applicator wooden box were below, 0.15 mR/hr.

- 4. Please see enclosed letter requesting renewal of my License as well as the appropriate fee.
- 5. No additional authorizations and changes are requested.
- 6. Person to be contacted in regard with this Renewal Application: Rafael Fossas, M.D. Tel. (809) 722-5004

