

FORM NRC-313M (8-78) 10 CFR 35	U.S. NUCLEAR REGULATORY COMMISSION <b>APPLICATION FOR MATERIALS LICENSE – MEDICAL</b>	Approved: GAO R0557
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**INSTRUCTIONS** – Complete Items 1 through 26 if this is an initial application or an application for renewal of a license. Use supplemental sheets where necessary. Item 26 must be completed on all applications and signed. Retain one copy. Submit original and one copy of entire application to: Director, Office of Nuclear Materials Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. Upon approval of this application, the applicant will receive a Materials License. An NRC Materials License is issued in accordance with the general requirements contained in Title 10, Code of Federal Regulations, Part 30, and the Licensee is subject to Title 10, Code of Federal Regulations, Parts 19, 20 and 35 and the license fee provision of Title 10, Code of Federal Regulations, Part 170. The license fee category should be stated in Item 26 and the appropriate fee enclosed.

1.a. NAME AND MAILING ADDRESS OF APPLICANT (institution, firm, clinic, physician, etc.) INCLUDE ZIP CODE  Bedford V.A. Medical Center 200 Springs Road Bedford, MA. 01730  TELEPHONE NO.: AREA CODE (617) 275- 7500	1.b. STREET ADDRESS(ES) AT WHICH RADIOACTIVE MATERIAL WILL BE USED (If different from 1.a.) INCLUDE ZIP CODE  SAME
2. PERSON TO CONTACT REGARDING THIS APPLICATION David I. Kurtz, Ph.D. Radiation Safety Monitor, R&D TELEPHONE NO.: AREA CODE (617) 275-7500x240	3. THIS IS AN APPLICATION FOR: (Check appropriate item) a. <input type="checkbox"/> NEW LICENSE b. <input type="checkbox"/> AMENDMENT TO LICENSE NO. _____ c. <input checked="" type="checkbox"/> RENEWAL OF LICENSE NO. 20-10184-01
4. INDIVIDUAL USERS (Name individuals who will use or directly supervise use of radioactive material. Complete Supplements A and B for each individual.)  See Supplements	5. RADIATION SAFETY OFFICER (RSO) (Name of person designated as radiation safety officer. If other than individual user, complete resume of training and experience as in Supplement A.)  Fred A. Rundlett, M.D. Chief, Radiology Service

6.a. RADIOACTIVE MATERIAL FOR MEDICAL USE None					
RADIOACTIVE MATERIAL LISTED IN:	ITEMS DESIRED	MAXIMUM POSSESSION LIMITS	ADDITIONAL ITEMS:	MARK ITEMS DESIRED	MAXIMUM POSSESSION LIMITS
	"X"	(In millicuries)		"X"	(In millicuries)
10 CFR 31.11 FOR IN VITRO STUDIES			IODINE-131 AS IODIDE FOR TREATMENT OF HYPERTHYROIDISM		
10 CFR 35.100, SCHEDULE A, GROUP I		AS NEEDED	PHOSPHORUS-32 AS SOLUBLE PHOSPHATE FOR TREATMENT OF POLYCYTHEMIA VERA, LEUKEMIA AND BONE METASTASES		
10 CFR 35.100, SCHEDULE A, GROUP II		AS NEEDED	PHOSPHORUS-32 AS COLLOIDAL CHROMIC PHOSPHATE FOR INTRACAVITARY TREATMENT OF MALIGNANT EFFUSIONS.		
10 CFR 35.100, SCHEDULE A, GROUP III			GOLD-198 AS COLLOID FOR INTRACAVITARY TREATMENT OF MALIGNANT EFFUSIONS.		
10 CFR 35.100, SCHEDULE A, GROUP IV		AS NEEDED	IODINE-131 AS IODIDE FOR TREATMENT OF THYROID CARCINOMA		
10 CFR 35.100, SCHEDULE A, GROUP V		AS NEEDED	XENON-133 AS GAS OR GAS IN SALINE FOR BLOOD FLOW STUDIES AND PULMONARY FUNCTION STUDIES.		
10 CFR 35.100, SCHEDULE A, GROUP VI					

6.b. RADIOACTIVE MATERIAL FOR USES NOT LISTED IN ITEM 6.a. (Sealed sources up to 3 mCi used for calibration and reference standards are authorized under Section 35.14(d), 10 CFR Part 35, and NEED NOT BE LISTED.)			
ELEMENT AND MASS NUMBER	CHEMICAL AND/OR PHYSICAL FORM	MAXIMUM NUMBER OF MILLICURIES OF EACH FORM	DESCRIBE PURPOSE OF USE
Hydrogen 3	Any	100 millicuries	In vitro laboratory studies and in vivo laboratory studies on plants and lower animals.  99337
Carbon 14	"	10 "	
Phosphorus 32	"	50 "	
Sulfur 35	"	10 "	
Iron 59	"	2 "	
Iodine 131	"	5 "	
Iodine 125	"	5 "	
Chromium 51	"	5 "	

# INFORMATION REQUIRED FOR ITEMS 7 THROUGH 23

For Items 7 through 23, check the appropriate box(es) and submit a detailed description of all the requested information. Begin each item on a separate sheet. Identify the item number and the date of the application in the lower right corner of each page. If you indicate that an appendix to the medical licensing guide will be followed, do not submit the pages, but specify the revision number and date of the referenced guide: Regulatory Guide 10.8, Rev. \_\_\_\_\_ Date: January 1979

7. MEDICAL ISOTOPES COMMITTEE <i>Not applicable</i>		15. GENERAL RULES FOR THE SAFE USE OF RADIOACTIVE MATERIAL <i>(Check One)</i>	
<input type="checkbox"/>	Names and Specialties Attached; and	<input checked="" type="checkbox"/>	Appendix G Rules Followed; or
<input type="checkbox"/>	Duties as in Appendix B; or _____ <i>(Check One)</i>	<input type="checkbox"/>	Equivalent Rules Attached
<input type="checkbox"/>	Equivalent Duties Attached	16. EMERGENCY PROCEDURES <i>(Check One)</i>	
8. TRAINING AND EXPERIENCE		<input checked="" type="checkbox"/>	Appendix H Procedures Followed; or
<input checked="" type="checkbox"/>	Supplements A & B Attached for Each Individual User; and	<input type="checkbox"/>	Equivalent Procedures Attached
<input checked="" type="checkbox"/>	Supplement A Attached for RSO.	17. AREA SURVEY PROCEDURES <i>(Check One)</i>	
9. INSTRUMENTATION <i>(Check One)</i>		<input checked="" type="checkbox"/>	Appendix I Procedures Followed; or <i>see survey area layout</i>
<input checked="" type="checkbox"/>	Appendix C Form Attached; or	<input type="checkbox"/>	Equivalent Procedures Attached
<input type="checkbox"/>	List by Name and Model Number	18. WASTE DISPOSAL <i>(Check One)</i>	
10. CALIBRATION OF INSTRUMENTS		<input checked="" type="checkbox"/>	Appendix J Form Attached; or
<input checked="" type="checkbox"/>	Appendix D Procedures Followed for Survey Instruments; or _____ <i>(Check One)</i>	<input type="checkbox"/>	Equivalent Information Attached
<input type="checkbox"/>	Equivalent Procedures Attached; and	19. THERAPEUTIC USE OF RADIOPHARMACEUTICALS <i>(Check One)</i> <i>Not applicable</i>	
<input type="checkbox"/>	Appendix D Procedures Followed for Dose Calibrator; or _____ <i>(Check One)</i>	<input type="checkbox"/>	Appendix K Procedures Followed; or
<input type="checkbox"/>	Equivalent Procedures Attached	<input type="checkbox"/>	Equivalent Procedures Attached
11. FACILITIES AND EQUIPMENT		20. THERAPEUTIC USE OF SEALED SOURCES <i>N/A</i>	
<input checked="" type="checkbox"/>	Description and Diagram Attached	<input type="checkbox"/>	Detailed Information Attached; and
12. PERSONNEL TRAINING PROGRAM		<input type="checkbox"/>	Appendix L Procedures Followed; or _____ <i>(Check One)</i>
<input checked="" type="checkbox"/>	Description of Training Attached	<input type="checkbox"/>	Equivalent Procedures Attached
13. PROCEDURES FOR ORDERING AND RECEIVING RADIOACTIVE MATERIAL		21. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE GASES (e.g., Xenon - 133) <i>N/A</i>	
<input checked="" type="checkbox"/>	Detailed Information Attached	<input type="checkbox"/>	Detailed Information Attached
14. PROCEDURES FOR SAFELY OPENING PACKAGES CONTAINING RADIOACTIVE MATERIALS <i>(Check One)</i>		22. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE MATERIAL IN ANIMALS	
<input checked="" type="checkbox"/>	Appendix F Procedures Followed; or	<input checked="" type="checkbox"/>	Detailed Information Attached
<input type="checkbox"/>	Equivalent Procedures Attached	23. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE MATERIAL SPECIFIED IN ITEM 6.b	
<input type="checkbox"/>		<input checked="" type="checkbox"/>	Detailed Information Attached

## 24. PERSONNEL MONITORING DEVICES

TYPE (Check appropriate box)		SUPPLIER	EXCHANGE FREQUENCY
a. WHOLE BODY	<input checked="" type="checkbox"/> FILM	United States Testing Co., Inc.	Monthly
	<input type="checkbox"/> TLD	Richland, Washington	
	<input type="checkbox"/> OTHER (Specify)		
b. FINGER	<input type="checkbox"/> FILM		
	<input type="checkbox"/> TLD		
	<input type="checkbox"/> OTHER (Specify)		
c. WRIST	<input type="checkbox"/> FILM		
	<input type="checkbox"/> TLD		
	<input type="checkbox"/> OTHER (Specify)		

d. OTHER (Specify)

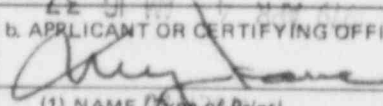
## 25. FOR PRIVATE PRACTICE APPLICANTS ONLY

a. HOSPITAL AGREEING TO ACCEPT PATIENTS CONTAINING RADIOACTIVE MATERIAL		b. ATTACH A COPY OF THE AGREEMENT LETTER SIGNED BY THE HOSPITAL ADMINISTRATOR.
NAME OF HOSPITAL		
MAILING ADDRESS		
CITY	STATE	ZIP CODE
c. WHEN REQUESTING THERAPY PROCEDURES, ATTACH A COPY OF RADIATION SAFETY PRECAUTIONS TO BE TAKEN AND LIST AVAILABLE RADIATION DETECTION INSTRUMENTS.		

## 26. CERTIFICATE

(This item must be completed by applicant)

The applicant and any official executing this certificate on behalf of the applicant named in Item 1a certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, Parts 30 and 35, and that all information contained herein, including any supplements attached hereto, is true and correct to the best of our knowledge and belief.

a. LICENSE FEE REQUIRED (See Section 170.31, 10 CFR 170)	b. APPLICANT OR CERTIFYING OFFICIAL (Signature) 
(1) LICENSE FEE CATEGORY Exempt (Par. 170.11 (a) (5))	(1) NAME (Type of Print) Michael J. Kane
(2) LICENSE FEE ENCLOSED: \$ NOT APPLICABLE	(2) TITLE Medical Center Director
	c. DATE March 30, 1979 99337

## 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 Form NRC-313M. 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 30-36 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 used: (a) to provide records to State health departments for their information and use; and (b) to provide information 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 a NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you. A copy of the license issued will routinely be placed in the NRC's Public Document Room, 1717 H Street, N.W., Washington, D.C.
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.
5. **SYSTEM MANAGER(S) AND ADDRESS** Director, Division of Fuel Cycle and Material Safety, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555.

TRAINING AND EXPERIENCE  
AUTHORIZED USER OR RADIATION SAFETY OFFICER

1. NAME OF AUTHORIZED USER OR RADIATION SAFETY OFFICER Fred A. Rundlett, M.D.	2. STATE OR TERRITORY IN WHICH LICENSED TO PRACTICE MEDICINE Massachusetts
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3. CERTIFICATION

SPECIALTY BOARD A	CATEGORY B	MONTH AND YEAR CERTIFIED C
Radiology	Radiology	December 1965

4. TRAINING RECEIVED IN BASIC RADIOISOTOPE HANDLING TECHNIQUES

FIELD OF TRAINING A	LOCATION AND DATE(S) OF TRAINING B	TYPE AND LENGTH OF TRAINING	
		LECTURE/ LABORATORY COURSES (Hours) C	SUPERVISED LABORATORY EXPERIENCE (Hours) D
a. RADIATION PHYSICS AND INSTRUMENTATION	Mass. General Hosp. 1963-4 Boston, MA. Nat. Naval Med. Center 1964-5	36 100	0 60
b. RADIATION PROTECTION	Same	" "	" "
c. MATHEMATICS PERTAINING TO THE USE AND MEASUREMENT OF RADIOACTIVITY	Same	" "	" "
d. RADIATION BIOLOGY	Same	" "	" "
e. RADIOPHARMACEUTICAL CHEMISTRY	Same	" "	" "

5. EXPERIENCE WITH RADIATION. (Actual use of Radioisotopes or Equivalent Experience)

ISOTOPE	MAXIMUM AMOUNT	WHERE EXPERIENCE WAS GAINED	DURATION OF EXPERIENCE	TYPE OF USE
Co 60	500 mc	Mass. General Hospital	9 months	Tele-therapy
Radium	50 mg	" "	"	implants
I 131	1 mc	Nat. Naval Medical	3 months	diagnosis
Au 198	"	Center, Bethesda,	"	"
P 32	"	Maryland	"	"
Cr 51	"	" "	"	"

PRECEPTOR STATEMENT

Not Applicable

Supplement B must be completed by the applicant physician's preceptor. If more than one preceptor is necessary to document experience, obtain a separate statement from each.

1. APPLICANT PHYSICIAN'S NAME AND ADDRESS		<b>KEY TO COLUMN C</b> <b>PERSONAL PARTICIPATION SHOULD CONSIST OF:</b> 1-Supervised examination of patients to determine the suitability for radioisotope diagnosis and/or treatment and recommendation for prescribed dosage. 2-Collaboration in dose calibration and actual administration of dose to the patient including calculation of the radiation dose, related measurements and plotting of data. 3-Adequate period of training to enable physician to manage radioactive patients and follow patients through diagnosis and/or course of treatment.
FULL NAME		
STREET ADDRESS		
CITY	STATE	

2. CLINICAL TRAINING AND EXPERIENCE OF ABOVE NAMED PHYSICIAN

ISOTOPE A	CONDITIONS DIAGNOSED OR TREATED B	NUMBER OF CASES INVOLVING PERSONAL PARTICIPATION C	COMMENTS (Additional information or comments may be submitted in duplicate on separate sheets.) D
I-131 or I-125	DIAGNOSIS OF THYROID FUNCTION		
	DETERMINATION OF BLOOD AND BLOOD PLASMA VOLUME		
	LIVER FUNCTION STUDIES		
	FAT ABSORPTION STUDIES		
	KIDNEY FUNCTION STUDIES		
	IN VITRO STUDIES		
OTHER			
I-125	DETECTION OF THROMBOSIS		
I-131	THYROID IMAGING		
P-32	EYE TUMOR LOCALIZATION		
Se-75	PANCREAS IMAGING		
Yb-169	CISTERNOGRAPHY		
Xe-133	BLOOD FLOW STUDIES AND PULMONARY FUNCTION STUDIES		
OTHER			
Tc-99m	BRAIN IMAGING		
	CARDIAC IMAGING		
	THYROID IMAGING		
	SALIVARY GLAND IMAGING		
	BLOOD POOL IMAGING		
	PLACENTA LOCALIZATION		
	LIVER AND SPLEEN IMAGING		
	LUNG IMAGING		
	BONE IMAGING		
OTHER			

**PRECEPTOR STATEMENT<sup>™</sup>** (Continued) Not Applicable

**2. CLINICAL TRAINING AND EXPERIENCE OF ABOVE NAMED PHYSICIAN** (Continued)

ISOTOPE  A	CONDITIONS DIAGNOSED OR TREATED  B	NUMBER OF CASES INVOLVING PERSONAL PARTICIPATION  C	COMMENTS  (Additional information or comments may be submitted in duplicate on separate sheets.)  D
P-32 (Soluble)	TREATMENT OF POLYCYTHEMIA VERA, LEUKEMIA, AND BONE METASTASES		
P-32 (Colloidal)	INTRACAVITARY TREATMENT		
I-131	TREATMENT OF THYROID CARCINOMA		
	TREATMENT OF HYPERTHYROIDISM		
Au-198	INTRACAVITARY TREATMENT		
Co-60 or Cs-137	INTERSTITIAL TREATMENT		
	INTRACAVITARY TREATMENT		
I-125 or Ir-192	INTERSTITIAL TREATMENT		
	TELETHERAPY TREATMENT		
Sr-90	TREATMENT OF EYE DISEASE		
	RADIOPHARMACEUTICAL PREPARATION		
Mo-99/ Tc-99m	GENERATOR		
Sn-113/ In-113m	GENERATOR		
Tc-99m	REAGENT KITS		
Other			

**3. DATES AND TOTAL NUMBER OF HOURS RECEIVED IN CLINICAL RADIOISOTOPE TRAINING**

<b>4. THE TRAINING AND EXPERIENCE INDICATED ABOVE WAS OBTAINED UNDER THE SUPERVISION OF:</b>		<b>6. PRECEPTOR'S SIGNATURE</b>	
a. NAME OF SUPERVISOR		<b>7. PRECEPTOR'S NAME</b> (Please type or print)	
b. NAME OF INSTITUTION			
c. MAILING ADDRESS			
d. CITY			
5. MATERIALS LICENSE NUMBER(S)		<b>8. DATE</b>	

4. INDIVIDUAL USERS

- A. See present license for users: ~~David I. Kurtz, Ph.D.~~  
Kalidas Nandy, M.D., Ph.D.  
Choompol Mahasaen, M.D.  
Deepak Pandya, M.D.  
Michael J. Malone, M.D.  
Ladislav Volicer, M.D., Ph.D.  
George Stidworthy, Ph.D.
- B. See attached Form AEC-313 for the addition of Ira Sherwin, M.D.  
to byproduct material license.

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Item 4. March 30, 1979

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5. INDIVIDUAL USERS

- A. See attached Form NRC-313-M-SUPPLEMENT A for resume of training and experience of Fred A. Rundlett, M.D., RADIATION PROTECTION OFFICER, Chief of Radiology Service, designated by and responsible to the hospital's management for the coordination of the institution's radiation safety program.

8. TRAINING AND EXPERIENCE

- A. See present license for users currently approved.
- B. See attached application form AEC-313 for the addition of Ira Sherwin, M.D. to the license for which we are applying for renewal.
- C. See attached Supplement A for Radiation Safety Officer.

## 9. INSTRUMENTATION

### 1. Survey meters

#### a. Tracerlab

Model number SU-21

1 instrument available

minimum range: 0 mr/hr to 0.5 mr/hr

maximum range: 0 mr/hr to 50 mr/hr

### 2. Dose calibrator: None

### 3. Diagnostic Instruments

### 4. Liquidscentillation Counter, ISOCAP, Nuclear-Chicago Abbott Auto-Logic gamma counter (Clinical Laboratory) Ludlum Thin Window Survey Meter (Clinical Laboratory), on order.

10. CALIBRATION OF INSTRUMENTS

1. Survey instruments will be calibrated at least annually and following repair.
3. Survey Instrument (Tracerlab Model SU-21 survey meter) will be calibrated by the manufacturer,

LFE Corporation  
1601 Trapelo Road  
Waltham, Mass. 02154

Survey Instrument (Ludlum, on order for Clinical Laboratory) will be calibrated by the manufacturer.

Item 10, Appendix D,  
Regulatory Guide 10.8  
January 1979

"OFFICIAL RECORD COPY"

## 11. FACILITIES AND EQUIPMENT

- a. See attached non-scale layout of facilities where byproduct material is used and stored (these layouts are used in the performance of area survey procedures; see No. 17). Location of fume hoods designated as radio-isotope work areas are given on the area survey layouts.
- b. Equipment:
  1. Nuclear-Chicago (Isocap/300) liquid scintillation counter (Bldg. 17, Rm. 1).
  2. Beckman (Type LS330) liquid scintillation counter (Bldg. 18, Rm. 213).
  3. Beckman (Type Biogamma) gamma counter (Bldg. 18, Rm. 219).
  4. Abbott (Type Autologic) gamma counter (Bldg. 1, Rm. 155, (CLINICAL LABORATORY)).

## 12. PERSONNEL TRAINING PROGRAM

Non-listed users (technicians, students, etc.) receive on-job training by listed supervisors (investigators). This training includes instruction as to areas where radioactive material is used or stored, potential hazards associated with radioactive material, radiological safety procedures appropriate to their respective duties, access to the rules and regulations of the licensee, their obligation to report unsafe conditions, appropriate response to emergencies and unsafe conditions, their right to be informed of their radiation exposure results, and policy memoranda from the Radiation Safety Monitor on the proper ordering, logging, and disposal procedures.

Non-listed personnel will be properly instructed by their listed supervisor before assuming duties with or in the vicinity of radioactive materials and whenever there is a significant change in duties, regulations, or the terms of the license.

13. PROCEDURES FOR ORDERING AND RECEIVING RADIOACTIVE MATERIAL

See Research & Development Memo attached (January 11, 1977)  
which is circulated to all users of radioactive material.

17. AREA SURVEY PROCEDURES

Appendix H Procedures are followed (U.S.N.R.C. Regulatory Guide 10.8), using the attached wipe-test non-scale layouts and Key to Wipe-Test Map.

Details of Clinical Laboratory procedures for area surveys are given in the attachments.

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18. WASTE DISPOSAL

1. Liquid waste will be disposed of by commercial waste disposal service (see also item 4 below). Water soluble waste will be disposed of in a sanitary sewer system in accordance with par.20.303 of 10CFR Part 20, the quantity released not exceeding the limits specified in Appendix B, Table I. Column 2 of Part 20 and the gross quantity released into the sewerage system not exceeding one curie per year.

3. Other solid waste will be disposed of by commercial waste disposal service (see also item 4 below).

4. The commercial waste disposal service used will be Interex Co., 66 Woerd Avenue, Waltham, Mass.  
NRC/Agreement State License No. 20-14082-01

See attached Clinical Laboratory Procedures for details of disposal, logging, decontamination, and wipe-test procedures.

22. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE  
MATERIAL IN ANIMALS

See attached RESEARCH SERVICE MEMORANDUM NO. 77-1  
and NO. 77-2, Section III, Part H for details of pre-  
cautionary procedures used in connection with radioactive  
materials in animals.

23. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE MATERIALS SPECIFIED IN ITEM 6.b.

Procedures and precautions taken for the use of radioactive materials specified in Item 6.b. have been outlined in other sections of this application. Bioassay programs have not been established since the quantities of iodine-125 (organic) worked with by any individual is less than 2 microcuries, and the quantities of organic tritium worked with by any individual is less than 1 millicurie.

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