

AUG 22 1979

FCMLB:MAL  
030-00959  
98676

St. Joseph's College  
ATTN: Dr. John P. Waldron  
Radiation Protection Officer  
City Avenue, 54th Street  
Philadelphia, PA 19131

Gentlemen:

This is in reference to your application dated February 12, 1979 for renewal of Materials License No. 37-01753-01. In order to continue our review of your application, we need the following additional information:

- OK 1. Since your license is issued in the name of St. Joseph's College, you should be sure that your response to this letter and all future license applications and amendment requests are signed by your college president or his delegated representative. This will assure that the administration concurs with your requested activities.
- OK 2. Describe your procedures for examining incoming packages for leakage, contamination or damage, and for safely opening packages in accordance with Section 20.205 of 10 CFR Part 20. It is recommended that, as a minimum, these include instructions to wear gloves, monitor the packages before opening, and monitor the packing material for contamination after opening.
- OK 3. Describe your procedures for ordering radioactive materials, for receipt of materials during off-duty hours, and for notification of responsible persons upon receipt of radioactive materials. These procedures should be adequate to ensure that possession limits are not exceeded, that radioactive materials are secured against unauthorized removal at all times, and that radiation levels in unrestricted areas do not exceed the limits specified in Section 20.105 of 10 CFR Part 20.
- OK 4. Section 19.12 of 10 CFR Part 19 requires that all personnel who work in or frequent a restricted area be given proper instruction so that they can perform their jobs safely. Accordingly, you should describe the type of training given to:
  - OK a. housekeeping personnel

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- b. security personnel
- c. students before they are allowed to work with radioactive materials.

For the types and quantities of material authorized by your current license normally informal training by your radiation protection officer is considered sufficient.

- 5. Submit a copy of the general laboratory safety instructions to be posted in each laboratory using radioactive materials. Appendix G of the enclosed Regulatory Guide 10.8 contains a set of general laboratory safety instructions for medical institutions that you may modify for your own purposes.
- 6. Submit a copy of the emergency procedures to be followed in case of spills or other type of accidents involving radioactive materials. It is recommended that emergency procedures contain as a minimum:
  - a. procedures to be followed during minor spills
  - b. procedures to be followed during major spills
  - c. your radiation safety officer's name, his office phone number and number to be used during off duty hours.
- 7. If radioactive materials are to be used in animals, please provide a copy of the instructions provided to animal caretakers for handling of animals, animal waste, carcasses, and cleaning and decontamination of animal cages.
- 8. Describe your bioassay program for individuals using millicurie quantities of radioactive iodine. You should include, the type of bioassays, the criteria and frequency for performing bioassays, and the type of action taken when positive results are obtained. For your assistance, we are enclosing an iodine bioassay guide that contain criteria for performing bioassays that we find acceptable.
- 9. With regard to your request for 10 millicuries of phosphorus-32:
  - a. You should develop and submit special safety instructions to be provided to individuals using millicurie quantities of phosphorus-32.
  - b. In addition to wearing body badges, individuals who routinely use millicurie quantities of phosphorus-32 should wear wrist or finger badges.
- 10. We note that in response to item number 11 of Form NRC 313(i) that you state that Bionic Instruments, Inc. had most recently calibrated your survey instruments. A check of our files indicates that Bionic Instruments, Inc. is no longer providing a survey instrument calibration services. Accordingly, you should state the name and procedures that the company that will calibrate your survey instruments.

11. We note that you are currently authorized for 33.5 millicuries of nickel-63 for use in gas chromatograph's that you have not requested in your renewal application. If this is not a typographical error, you should state how you dispose of the source.
12. With regard to your request for a Koffman Model 710A neutron generator, you should provide all the information requested in the enclosed "Information for evaluation of a neutron generator utilizing tritium targets."

Sodium-22 and cobalt-57, produced in a cyclotron, are not byproduct material as defined in Section 30.4(d) of Title 10, Code of Federal Regulations, Part 30, and are not subject to licensing by the NRC. Therefore, you may procure and use these materials even though they are not listed specifically on your license.

You should contact your State regulatory authorities to determine the State licensing or registration requirements for use of radionuclides.

We will continue our review of your application upon receipt of this information. Please reply in duplicate and refer to Control No. 98676.

Sincerely,

Michael A. Lamastra  
Material Licensing Branch  
Division of Fuel Cycle and  
Material Safety

Enclosures:

1. Iodine Bioassay Guide
2. Regulatory Guide 10.8
3. Information for Evaluation of  
a Neutron Generator Utilizing  
Tritium Targets.

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8/22/79

MB *[Signature]*  
WJWalker  
8/21/79