

MAR 21 1980

FCMLB:MAL
030-17422
(02950)

West Virginia School of Osteopathic
Medicine
ATTN: Charles M. Paroda, Ph.D.
Radiation Protection Officer
400 North Lee Street
Lewisburg, WV 24901

Gentlemen:

This is in reference to your application dated February 29, 1980, for a byproduct material license for nonhuman use. In order to continue our review of your request, we need the following additional information:

1. It is the current policy of the Nuclear Regulatory Commission to list individual users to new licensees requesting a specific license of limited scope. Accordingly, you should provide to us a list of each individual authorized user, their training and experience and the isotopes to be authorized.
2. Submit a description of the duties and responsibilities of your radiation protection officer, Charles M. Paroda, Ph.D., under your license. Typical duties of a radiation protection officer would be:
 - a. To ensure that the use of radioactive material is by or under the direct supervision of individuals specifically listed on your license.
 - b. To ensure that all users (where appropriate) wear personnel monitoring equipment when using radioactive materials.
 - c. To ensure that radioactive materials are properly secured against unauthorized removal at all times when not in use.
 - d. To perform routine inspections of all laboratories using or storing radioactive materials.
 - e. To ensure that the terms and condition of your license are met, and that all required records are maintained.

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7. 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.
8. With regard to your personnel training program:
- a. Verify that technical personnel (e.g., authorized users, technicians, students), will receive refresher training at least once annually.
 - b. Auxiliary personnel (clerical, housekeeping, security, etc.) who may have occasion to enter restricted areas (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.
9. Submit a copy of general safety instructions to be followed by laboratory personnel while working with radioactive materials.
10. Submit a copy of the emergency procedures to be posted in each laboratory using radioactive materials, and that these instructions include the radiation safety officer's name, his office phone number and a phone number to be used during off-duty hours.
11. Describe your procedures for complying with Section 20.1(c), Section 20.103, and Section 20.106 of 10 CFR Part 20, for procedures such as tritium labeling experiments that may release volatile or gaseous radioactive materials to restricted and unrestricted areas. You should include a description of the type of survey (e.g., environmental or breathing zone), frequency of surveys, and the individuals who will perform the surveys (e.g., radiation safety officer or investigator), equipment to be used, and the procedures for evaluating the results.
12. State the frequency that your survey instruments will be calibrated by the Picker Corporation. As a minimum, you instruments should be calibrated at least once annually.
13. Submit a list of your current membership of your radiation safety committee with a brief description of their training and experience.

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- OK
3. Describe your bioassay program for individuals using millicurie quantities of tritium. You should include the type of bioassays, the criteria and frequency for performing bioassays, and the type of actions taken when positive results are obtained. For your assistance, we are enclosing a tritium bioassay guide that contains criteria for performing bioassays we find acceptable.
- OK
4. In support of your request for 500 millicuries of phosphorus-32, you should develop and submit special safety instructions to be provided to individuals using millicurie quantities of P-32. We recommend that your procedures include, but not be limited to, the following:
- a. The use of low density shielding (e.g., Plexiglass) in order to keep Bremsstrahlung radiation at a minimum.
 - b. A mandatory radiation survey and wipe test procedures after each use.
 - c. The use of finger type extremity monitors for procedures that involve 1 millicurie or more.
 - d. The use of dry runs prior to performance of unfamiliar procedures in order to preclude unexpected complications. In addition, it is recommended that the radiation protection officer be present during new procedures.
 - e. The use of eye protection for procedures that involve 10 millicuries or more.
5. Submit a modified diagram of each laboratory that will store radioactive materials. We are particularly interested in the placement and dimension of shielding materials used to reduce radiation exposures to restricted and unrestricted areas.
6. With regard to your procedures for receiving packages containing radioactive materials:
- a. For an institution requesting the types and quantities of material on your license, packages containing radioactive materials should be received at one central location. Normally this is the radiation safety office.
 - b. Submit a copy of the instructions provided to security personnel receiving packages containing radioactive materials during off-duty hours. These procedures should include, as a minimum, your radiation protection officer's name, his office phone number, and a phone number to be used during off-duty hours.

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Cobalt-57 and sodium-22, 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 without amendment to your byproduct material license.

You should contact your state regulatory authorities to determine any state licensing or registration requirements for use of these radionuclides.

We will continue our review of your application upon receipt of this information. Please reply in duplicate and refer to Control No. 02950.

Sincerely,

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

Enclosures:

1. Tritium Bioassay Guide
2. Academic Licensing Guide

Std. Br. Dist.

CRESS:WILL

MC#054100:gtw

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