

**Veterans
Administration**

In Reply Refer To: 586/115

September 11, 1985

Carol A. Connell
Radiation Specialist
Nuclear Materials Safety Section
U.S.N.R.C. Region II
101 Marietta Street, N.W.
Atlanta, Georgia 30323

Dear Ms. Connell:

Enclosed please find the additional material you requested outlining
our ALARA radiation safety program.

For future reference, I would like to request a copy of NUREG-0267
as mentioned in Regulatory Guide 3.18.

In addition, I would like to request that our license be amended to
permit use of I-131-6- β iodomethyl-19-norcholesterol (NP-59) to be used
for adrenal imaging. This material will be obtained from the Nuclear
Pharmacy of the University of Michigan. Application has been made to
the FDA for use of this investigational drug, but the University of
Michigan indicates that NRC approval is necessary for holders of group
licenses. Therefore, I am assuming that this material does not qualify
under 10 CFR, part 35, section 35.100c subsection 5. We are requesting
a possession limit of 10 millicuries.

J. L. WARNOCK
Center Director

Enclosure: 1

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REG2 LIC30
23-08786-01 PDR

Official Copy

RADIATION SAFETY PROGRAM
VA Medical Center
Jackson, Mississippi

This program is based on and designed to comply with the ALARA concept set forth in NRC Regulatory Guides 10.8 (appendix O) and 8.18. The purpose of this program is to ensure that personnel occupational radiation exposure is kept "as low as reasonably achievable" (ALARA).

In accordance with this desire, the following policies are established for this institution:

I. Management Commitment:

A. An administrative organization for radiation safety will be established including a radiation safety committee and a radiation safety officer.

B. Management will instruct the above organization to develop written policies, procedures and instructions to foster the ALARA concept.

C. Management will conduct an annual review of the radiation safety program including the following:

1. review of operating procedures regarding radiation safety
2. radiation exposure records
3. consultations with radiation protection staff and/or outside consultants

D. Where indicated or recommended by radiation safety staff, management will modify operating and maintenance procedures, equipment or facilities to reduce radiation exposure unless the cost is considered unjustified. If modifications are recommended but not implemented, management will justify nonimplementation in writing.

E. Management will commit to giving full support to the ALARA plan outlined below and to the objective of achieving exposure levels as low as possible both for individual workers and for all workers taken as a group.

II. Radiation Safety Committee:
(See also Item 7 original license submission)

The radiation safety committee (RSC) will perform the following duties:

- (A) review qualifications of applicants to use byproduct materials; all applicants should have systematized procedures to ensure the ALARA concept.
- (B) the RSC will delegate authority to the radiation safety officer (RSO) to enforce the ALARA concept and will support the RSO in

those instances where it is necessary for the RSO to assert his/her authority.

- (C) perform a quarterly review of occupational radiation exposure
The investigational levels established in Table 0-1 Regulatory Guide 10.8 will be used as a basis for further action.
- (D) annual review of the ALARA program effectiveness. This will include efforts of the RSO, authorized users and workers as well as management.

III. Radiation Safety Officer:

The radiation safety officer (RSO) will perform the following duties:

- (A) annual review of radiation safety program for effectiveness of the ALARA program.
- (B) quarterly review of occupational exposure records. Investigational levels established in Table 0-1 Regulatory Guide 10.8 will be used as a basis for further action.
- (C) quarterly review of records of radiation level surveys in restricted and unrestricted areas to determine whether they were at ALARA levels during the previous quarter.
- (D) schedule briefings and educational sessions to inform workers of ALARA program.
- (E) ensure that authorized users, workers and ancillary personnel who may be exposed to significant radiation will be instructed in the ALARA philosophy and informed that management and the radiation safety staff are committed to implementing the ALARA concept. Radiation workers will be given opportunities to participate in formulation of the policies and procedures that will support the ALARA concept.

- (F) investigate all known instances of deviation from good ALARA practices and determine if possible the cause, and take corrective action.

IV. Authorized users:

- A. Must consult with and receive the approval of the RSO and/or RSC during the planning stage before using byproduct materials for a new procedure.
- B. Must evaluate all procedures before using radioactive materials to ensure that exposure will be kept ALARA.
- C. Will ensure that persons under his/her supervision who will be subject to occupational radiation exposure are trained and educated in good health physics practices and in maintaining exposures ALARA.
- D. Will explain the ALARA concept and his/her commitment to it to all persons under his/her supervision. Individual workers will be instructed in the ALARA concept and its relationship to their working conditions. Also they will be informed of what recourses are available if they feel ALARA is not being promoted on the job.

V. Investigational Levels:

- A. The RSO will review and record on Form NRC-5 results of personnel monitoring not less than once in any quarter as required by 10CFR, part 20, section 20.401.
- B. This facility will establish the levels given in Table 0-1 Regulatory Guide 10.8 as the Investigational Levels which, when exceeded, will initiate review or investigation by the RSO or RSC.

C. The following actions will be taken when these investigational levels are exceeded:

- (1) For personal exposures equal to or greater than Level I but less than Level II:
 - (a) The RSO will review the exposure record of the individual and report the results at the first RSC meeting following the quarter in which the exposure was recorded.
 - (b) If the exposure does not equal or exceed Level II, no action by the committee is required except that the exposure be compared to others performing similar tasks as an index of ALARA program quality. Modifications or actions may be taken if deemed appropriate by the committee. The review will be recorded in the committee minutes.
- (2) Exposure equal to or greater than investigational Level II:
 - (a) The RSO will investigate the cause(s) and if warranted, take action. A report of the investigators' actions taken (if any) and a copy of the individual's Form NRC-5 will be presented to the RSC at its first meeting following completion of the investigation. Details of these reports will be recorded in the RSC minutes. Committee minutes will be sent to the management of this institution for review, and will be available to NRC inspectors for review at the time of the next inspection.

- (b) If a worker's or a group of workers' exposure levels need to exceed Investigational Level II in order to perform their duties, a new higher Level II may be established by the RSO as long as it is consistent with good ALARA practices and the justification for the increase is approved by the RSC.
- If exposure equals or exceeds the newly established Investigational Level II, those actions listed above in paragraph IIa will be followed.

VI. Signature of certifying official:

I hereby certify that this institution has implemented the ALARA program set forth above.

Signature

Name (print or type)

Title

Institution name

Address
