

APR 08 1985

Saint John Hospital
ATTN: Mark Anthony
Associate Administrator
22101 Moross Road
Detroit, MI 48236

License No. 21-03210-01

Re: Letter Dated November 9, 1984 Requesting an Amendment To
NRC License No. 21-03210-01

Gentlemen:

Please be advised that we cannot give your facility a generic exemption from the regulations contained in 10 CFR Part 35, Section 35.14(b). The review and approval of requests to "transfer" radioactive materials between NRC licensed medical institutions - situations that do not require the transferor to obtain a distribution license, are reviewed on a case-by-case basis. Therefore, in order to continue our review of your request, it will be necessary for you to submit the following information:

1. Justification for this request, i.e., the reason that the facilities involved cannot receive materials solely in accordance with 10 CFR 35.14.
2. Submit the names of the institutions from which you will be receiving materials, as well as their NRC license number, and concurrence from the administrator at each participating institution.
3. Identification of each type and quantity of radiopharmaceuticals that will be transported (e.g., unit doses of Tc-sulfur colloid, etc.).
4. For transfers involving Group VI sources, procedures for maintaining source accountability at all participating institutions.
5. A general, but complete description of how a typical transfer will work (i.e., which institution will transfer material, how a typical transfer will be initiated, the title of the person responsible for initiating and implementing the transfer a general description of the events that will follow once the materials are on the site of the receiving institution, etc.).
6. Identification of the individuals who will transport the material, and the training they will receive. This training should, as a minimum, include all the items outlined in 10 CFR 19.12 and decontamination procedures in case of spills.
7. Safety measures to be used in transporting the radioactive materials in the applicants' vehicles (e.g., security against unauthorized removal, away from passenger compartment, absorbent paper, lead shields, etc.).
8. Emergency procedures to be followed in case of accidents involving spills or loss of radioactive materials.

9. Confirmation that vehicles used for transporting materials will be surveyed for contamination after each transfer.
10. Confirmation that receipt and package opening procedures will be at least equivalent to those outlined in Appendix F of Regulatory Guide 10.8, October 1980.

We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, and refer to Control Number 77858.

If you have any questions or require clarification on any of the information stated above, you may contact us at (312) 790-5625.

Sincerely,

Original Signed By
Patricia J. Whiston
Materials Licensing Section

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Whiston/jl

4/5/85