NMSS:JEW
Control No. 15853

MAY 29 1985

Veterans Administration Medical Center
ATTN: James A. Goff
Medical Center Director
5th and 4th Streets
Boise, Idaho 83702

Gentlemen:

This is in reference to your request for a byproduct material license renewal in the name of Veterans Administration Medical Center. In order for us to complete our review of your request, please supply the following:

1. If you propose to calibrate your own radiation survey and monitoring instruments, you should submit a detailed description of your planned calibration procedures. The description of your calibration procedures should include, as a minimum:

   a. Manufacturer's name and model number of the source(s) to be used.

   b. Nuclide and quantity of radioactive material contained in the calibration source.

   c. Exposure rate at 1 meter from the source.

   d. Accuracy of your calibration source(s) and their traceability to a primary standard should be provided.

   e. Step-by-step calibration procedures, including associated radiation safety procedures. These procedures should include a two-point calibration on each scale of each instrument with their points separated by at least 50% of the scale.

   f. The name(s) and pertinent experience of person(s) who will perform survey instrument calibrations.

2. If you intend to contract out the calibration of your radiation survey and monitoring instruments, you should specify the name, address, and the license number of the firm. You should contact the firm that will provide calibration services to determine if information concerning calibration procedures has been filed with the Commission. If not, you should obtain information concerning calibration procedures and submit them for NRC staff review.

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RJEverett
5/24/85

3. Item 12 of your Radiation Protection Guide (RPG) appears to exempt certain packages containing licensed material from safe opening procedures. There should be no exemptions from safe opening procedures.

   Appendix F of Regulatory Guide 10.8 contains a method that is acceptable to the NRC staff for implementing the regulation in 10 CFR 20.205(d), which applies to all packages containing licensed material. You cannot use the exemptions in 10 CFR 20.205(b), which apply to receiving packages, as a substitute for the procedures in Appendix F which apply to opening all packages.

4. RPG Items 26.1(b) and 26.2 indicate that you plan to incinerate animal excreta and various types of solid waste. Note that 10 CFR 20.305 requires that approval must be granted by NRC prior to incineration of waste other than specific waste identified in 10 CFR 20.306. Submit for NRC staff review your step-by-step procedures, release limits, supporting calculations of expected effluents, and pertinent information requested in 10 CFR 20.106(c) for effluent releases expected when incinerating byproduct materials.

5. Note Item 1.b. of your letter dated March 11, 1985, should read 33.15(b) of 10 CFR Part 33, not the reference of 33.5(b) of 10 CFR Part 33 that was given. Amend your response to reflect this important change and resubmit for NRC staff review.

6. Examine page 1.a of your September 28, 1984, application and note that Y-40 does not exist. Amend your application to delete this item or supply the correct isotope.

We will continue our review of your application upon receipt of this information. Please reply in duplicate and refer to Control No. 15853.

Sincerely,

Original Signed By
Jack E. Whitten

Jack E. Whitten
Nuclear Materials Safety Section

Enclosure:
Regulatory Guide 10.8

cc:
Director, Nuclear Medicine
Services (115)
Veterans Administration
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Washington, DC 20420