

SPRINGFIELD MEDICAL IMAGING CENTER

BALTIMORE PIKE & ANDREW ROAD, P.O. BOX 247 SPRINGFIELD, PA 19064

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July 16, 1985

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U.S. N.R.C.
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John E. Glenn, Ph.D., Chief
Nuclear Materials Section B
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Ave.
King of Prussia, PA 19406

Dear Dr. Glenn:

Please find our application for private practice medical byproduct material license enclosed. In addition to the enclosed application data, we wish to state the following:

1. As an alternative to the procedure of activity linearity measurement for dose calibrators listed in the Licensing Guide 10.8-27,E, we wish to submit the enclosed S.C.L.C.M. method to be performed by our consultant physicists, Walter L. Robinson & Associates, quarterly, and only after running the classical method in conjunction to assure a comparison of accuracy of +/- 5%.
2. We wish the latitude to utilize any service providing radiation survey meter calibrations that has been approved by the N.R.C. or Agreement State. We will also possess the license number that the procedure is on file with the N.R.C. or Agreement State. An example would be Radiation Management Inc., Philadelphia, PA, Nuclear Pharmacy/Syncor, Philadelphia, PA, or Walter L. Robinson & Associates, Lancaster, PA.
3. All other parts of Appendix D Section 2 will be followed except page 10.8-27 Item C. 4., 5., 6., 7. In lieu of this we will calculate the difference in inaccuracy in %, and record this in a log to assure +/- 5% variation of a computer-decayed table (sample enclosed) of reference standards, which is posted by the dose calibrator. In addition, No. 7 we will substitute Co-57 and/or Ba-133 for Cs-137, which will be used daily to check instrument constancy for the clinically used radionuclides. In lieu of Cs-137, Ba-133 will be used quarterly by our consultant radiation physicists, Walter L. Robinson & Associates, for a more complete reproducibility/constancy check. No Cs-137 source will be possessed, since its energy is inappropriate as a mock clinical radionuclide.

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4. We will have one end-windowed G.M. Survey meter; however, when it is out for calibration our back-up will be a side-windowed G.M. survey meter.

5. Currently our radiopharmaceuticals are supplied by a radiopharmacy such as Nuclear Pharmacy/Syncor or Mallinckrodt Nuclear, and our receipt of radioactive material is only during office hours. We also return all spent syringes, vials and contaminated waste after decay to background to the radiopharmacy. If and when we wish to return to a Mo-99/Tc-99m generator or off-duty delivery, we will utilize the recommended ordering, handling, and security measures described in Appendices E., F., and J. We would also measure all generators and pack them according to D.O.T. regulations upon return to the manufacturer. If we possess a Mo-99/Tc-99m generator, we will have a survey meter capable of reading at least 1 R/hr.

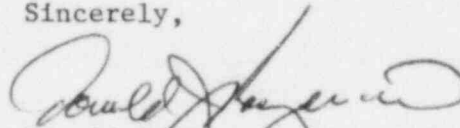
6. Our technologist training program is as per the subjects listed in 10 CFR 19.12, but not limited to this. The review is provided in the form of in-services and V.C.R. tapes given by our consultant radiation physicists, Walter L. Robinson & Associates. For clerical and house-keeping personnel, we initially provide written guidelines and follow annually with verbal review of radiation safety instructions from our nuclear medicine technologist. Videotaped in-services from our consultant physicists will also be available for ancillary personnel.

Please find enclosed the letter of agreement from Taylor Hospital, Ridley Park, PA.

The credentials for Donald Kasper, M.D., and Ben-Zion Friedman, M.D. can be found in N.R.C. licenses at Sacred Heart Hospital, Chester, PA 37-06717-04 and Taylor Hospital, Ridley Park, PA 37-16507-02.

If you have any specific or technical questions with regard to this application, please contact our consultant radiation physicist, Walter L. Robinson, at 717-397-2569.

Sincerely,



Donald J. Kasper, M.D.
Springfield Medical Imaging Center