

MAY 22 1985

Docket No.: 030-03545  
License No.: 53-04935-01  
Control No.: 70154

Philip J. W. Lee, M.D.  
Suite 101, A.Y. Wong Bldg.  
1507 South King Street  
Honolulu, Hawaii 96826

Gentlemen:

This is in reference to your application dated January 21, 1985 to renew your byproduct material license. In order to complete our review, we need the following additional information:

1. Regulatory Guide 8.20 states that sealed bottles or containers holding more than 0.1 millicurie of I-131 should be opened at least initially within hoods having a face velocity of 0.5 meters per second or more.

You should amend and resubmit the appropriate section(s) of your procedures to instruct your personnel to follow this practice.

2. The linearity test which you have described in Item 10, page 2 of your application does not meet the criteria in Appendix D of Regulatory Guide 10.8 for the following reasons:

- a. The activity of material to be used is not equivalent to the maximum anticipated activity to be assayed.
- b. The use of I-131 introduces the possibility of error in the linearity test due to changing performance of the dose calibrator over a period of time (24 days).

You should amend and resubmit this portion of your procedures.

3. It is our understanding that Gamma Corporation no longer calibrates survey instruments as a customer service.

You should submit the name, address, and NRC license number of the consultant who will calibrate your survey instruments and conduct leak tests.

B510240435 B50822  
REG5 LIC30  
53-04935-01 PDR

OFFICE	RV					
SURNAME	Reidlinger:fr					
DATE	5/22/85					

Philip J. W. Lee, M.D.

-2-

4. Both your package opening procedures and your emergency procedures reference Mr. Bill Hornig. You should describe Mr. Hornig's responsibilities as they relate to this license, and describe his training and experience with the types of materials listed on the license.

We will continue the review of your license renewal request upon receipt of this information. You should submit your response within thirty (30) days from the date of this notice. Please reply in duplicate, and refer to Mail Control No. 70154.

Sincerely,

Beth A. Riedlinger  
Health Physicist (Licensing)  
Nuclear Materials Safety Section

Enclosures:

Regulatory Guide 8.20

Appendix D to Regulatory Guide 10.8