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(18012)
030-02260

Department of the Air Force
USAF Medical Center, Keesler (ATC)
ATTN: Barry H. Thompson, Colonel
USAF, MC
Commander S
Keesler Air Force Base, MS 39534

Gentlemen:

This is in reference to your application, requesting a renewal of your Byproduct Material License No. 23-01002-02. In order to continue our review, please submit the following additional information:

1. Currently, physicians and research users of radioactive material are evaluated and appointed by the USAF Medical Center, Keesler, Radiation Safety Committee rather than the NRC. If you wish to continue this privilege, please confirm that any physician authorized to use radioisotopes in or on humans will, as a minimum, meet the criteria specified in Appendix A, "Guide for the Preparation of Applications for Medical Programs," Regulatory Guide 10.8 (Revision 1) and as revised December 2, 1982, (47 FR 54376).
2. In regard to your Radiation Safety Committee authorizing in vitro and laboratory users, submit your criteria in detail and include the type of training, work experience or on-the-job training, education, and safety features your Radiation Safety Committee will require for personnel handling various types and quantities of radioactive materials. For the minimum training and experience criteria required by NRC, see Section 33.15(b) of 10 CFR Part 33 (enclosed).
3. Please confirm that radiation workers (e.g., technologists) will receive instructions as specified in 19.12 of 10 CFR Part 19. Even though you employ skilled radiation workers, many of the items in 10 CFR Part 19 pertain to circumstances at your particular institution, and it may not be assumed that these instructions have been adequately covered by prior occupational training.

Describe the training that will be provided to all personnel who work with, or in the vicinity of, radioactive materials. Include the form of training (e.g., formal course work, lectures), frequency of training, duration of training, and subject matter.

Also, verify that personnel will be properly instructed: before assuming duties, during annual refresher training, and whenever there is a significant change in duties or regulations.

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4. This is in reference to your request for a maximum possession limit of 100 millicuries for in vitro studies as listed in 10 CFR Part 31.11. Currently you are authorized a possession limit of 3 millicuries. If an increased possession limit of these isotopes for in vitro research is needed, you must separately increase the possession limit for each of the isotopes already listed on your license.
5. If you wish to continue performing animal studies, please describe procedures to be followed when radioisotopes are used in animals. See Item 22 of Regulatory Guide 10.8 for further reference.
6. Please be advised that thyroid uptakes can occur by breathing volatile iodine which is released when the cap is first removed from the vials containing liquid iodine-131. Accordingly, personnel should be instructed to wear gloves and to open vials in a fume hood or take alternative precautionary measures.
7. In regard to your request for iodine and tritium isotopes for in vitro and animal studies, you must develop and submit a complete and detailed bioassay program. We have enclosed for your guidance on bioassay programs involving iodine-125, iodine-133 and tritium, Regulatory Guide 8.20 for the iodines and the draft guide for tritium.
8. Please confirm that your procedures for safely opening packages containing radioactive material and your procedures for ordering and accepting delivery of radioactive material will include maintaining written records.
9. Please note that your area survey action level units of counts per minute (CPM) 100 CPM/100 cm²) is not in accordance with NRC policy. The action levels must have the units of disintegrations per minute (DPM). Resubmit your action levels in DPM/100 cm² for your decontamination areas. Enclosed is Regulatory Guide 8.23 for further guidance.

We will continue the review of your renewal application upon receipt of the requested information. Please reply in duplicate and reference Mail Control No. 18012.

Sincerely,

Cassandra F. McDonald
Material Licensing Branch
Division of Fuel Cycle and
Material Safety

Enclosures:

1. Regulatory Guide 10.8
2. Regulatory Guide 8.20
3. Regulatory Guide 8.23
4. 10 CFR Parts 19, 31, 33

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