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Docket No. : 030-08203
License No.: 46-06377-04
Control No.: 19068

U. S. Department of Commerce
NOAA, NMFS, EC Division
Northwest & Alaska Fisheries Center
2725 Montlake Boulevard, East
Seattle, Washington 98112

Attention: William T. Roubal, Ph.D.
Radiation Safety Officer

Gentlemen:

This is in reference to your letter dated June 25, 1985 for an amendment to your byproduct material license. In order to complete our review, we need the following additional information:

1. Thyroid uptake can occur by breathing volatile iodine which is released when the cap is first removed from vials containing liquid iodine 125 or 131. Personnel should be instructed to wear gloves and to open the vials in a fume hood or to take alternative precautionary measures.

   A bioassay program should be established for personnel who handle millicurie quantities of liquid iodine 125 or 131. As a minimum, thyroid counts should be obtained approximately twenty-four (24) hours after exposure. Refer to the enclosed copy of Regulatory Guide 8.20.

   Submit the precautionary measures and the bioassay procedures that you will follow. Identify by name and license number the facility which will conduct bioassays for your personnel. If you plan to conduct bioassays on an in-house basis, you should identify the equipment that you will use by manufacturer's name and model number. Describe your procedure for calibrating this equipment prior to the performance of bioassays.

2. In support of your request for 2 millicuries of phosphorus-32, you should develop and submit special safety instructions to be provided to individuals using millicurie quantities of P-32. We recommend that your procedures include, but not be limited to, the following:

   a. The use of low density shielding (e.g., plexiglass) in order to keep Bremsstrahlung radiation at a minimum.

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b. A mandatory radiation survey and wipe test procedure after each use.

c. The use of finger type extremity monitors for procedures that involve 1 millicurie or more.

d. The use of a dry run prior to the performance of unfamiliar procedures in order to preclude unexpected complications. In addition, it is recommended that the radiation protection officer be present during new procedures.

3. Personnel monitoring devices should be provided for laboratory personnel using I-125, I-131, or P-32. You should specify:

a. The type of devices to be used (film badge or TLD)

b. The frequency of exchange (no less than monthly for film badges, no less than quarterly for TLDs).

4. Although you have stated that periodic surveys will be conducted in laboratory areas, you should institute routine laboratory surveys at specified intervals. These surveys should include both radiation level surveys and contamination wipe analyses. You should describe the survey program which you will use, including:

a. The frequency of radiation level surveys.

b. The frequency of contamination wipe surveys.

c. A description of the survey records which will be maintained (A copy of Appendix I from Regulatory Guide 10.8 is enclosed for reference).

d. Identification of the calibrated survey instrument(s) which will be used to conduct these surveys.

We will continue the review of your amendment 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. 19068.

Sincerely,

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

Enclosures:
Regulatory Guide 8.20
Appendix I from Regulatory Guide 10.8