

THE MEDICAL CENTER OF DELAWARE

DOCKET NUMBER **PR-30, 31, 32 et al**
PROPOSED RULE **(50 FR 30616)** ①

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OFFICE OF SECRETARY
DOCKETING & SERVICE August 21, 1985
BRANCH

ADDRESS REPLY TO:

DEPARTMENT OF RADIATION THERAPY

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RE: Volume 50, FR No. 144
July 26, 1985
Proposed Rules, Page 30616

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Gentlemen:

This letter is in response to proposed rule changes contained in 10CFR35.415 Safety Precautions: Item (A) states, "The licensee shall provide a private room to each individual hospitalized for implant therapy."

The Christiana Hospital is in the process of constructing a radiation shielded room designed for two brachytherapy patients in adjacent beds. A radiation shielding partition is to be interposed between the two beds. The radiation shielding has been designed to meet the requirement of 20.105 (b), (1) and (2), for areas outside this room. The radiation barrier between the two beds has also been designed to meet the above requirements; that is, the radiation dose to the patient on the other side of the radiation barrier from the adjacent patient will meet the above stated requirements. The total cost to modify this room so that the dose limits, as stated in 20.105 (b) and not exceeded, will cost more than one hundred thousand dollars, (\$100,000).

Our current approach, with respect to our brachytherapy patients, is to put them in a private room, leaving the two adjacent rooms vacant. This approach permits us to meet the requirements of 20.105 (b). This approach removes a total of six beds from use for one brachytherapy patient.

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A PRIVATE, NOT-FOR-PROFIT, NON-GOVERNMENT HOSPITAL, RECEIVING NO TAX SUPPORT FOR OPERATIONS

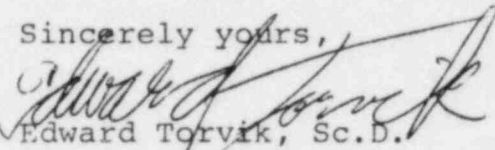
Acknowledged by card... AUG 27 1985

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A literal interpretation of 35.415 (a) would permit only one patient in this room. I would suggest that you rephrase 35.415 (a) in such a way so that the only restrictions would be those of 20.105 (b).

Sincerely yours,



Edward Torvik, Sc.D.
Physicist

ET/cas

cc: E. F. Dunbar
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C. A. Cuccia, M.D.