

## ANALYSIS OF PART 35 LICENSE AMENDMENTS

Each month, NMSS generates a list of licenses that were amended during the month. The printouts for November 1984 through February 1985 were used to pull those Part 35 licenses that were amended during the period. The amendments were reviewed chronologically backwards until 100 completed and filed actions had been tabulated. (Although some actions had been completed, the supporting paperwork was not in the file because it is being microfiched.) The 100 actions represents about a 5% sample of Part 35 amendment requests for a calendar year. The results of the sort and tally are as follows:

Number of actions sorted and tallied: 100\*

Number of major changes as defined by proposed Part 35: 69

- Users-51
- Type of use-15
- Location-5
- Inventory-2

Number of miscellaneous changes that would still require an amendment for administrative reasons (e.g. name change, change of address but not location, short term extension, etc.): 6

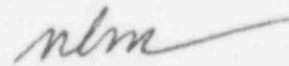
Number of minor changes: 37

- Area of use-21
- Equipment-5
- Quality assurance procedures-11
- Service contractor-8
- Handling procedure-6

\*Some requests contained both major and minor changes, so the breakout of major, miscellaneous, and minor does not add to 100. If a request contained one or more major changes, a single tally was placed in the "major change" column; if a request contained one or more minor changes, a single tally was placed in the "minor change" column; if a request contained both, a single tally was placed in each column.

The average turnaround time was 62 days; the standard deviation was 51 days. There were no submissions that had major safety deficiencies. All the minor safety deficiencies were in areas where NRC has not published clear guidance. Some minor deficiencies were administrative in nature (wrong fee, president did not sign request).

For the major requests, 33 of the 69 were not deficient; for the minor requests, 25 of the 37 were not deficient.

  
Norman L. McElroy  
3-25-85

# Deficiencies

				1	1	result
H	ART	0	xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	24	27	
		mixed 0	xxxxxx	8	9	
		✓	xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	29	25	
		mixed 1	xxxx	4	5	
		0	xxxxxxxxxxxxxxxx	16	14	
	Proc	✓	xxxxx	6	5	
PP	ART	0	xxxx	5	5	
		mixed 0		0	0	
		✓	xxx	3	4	
		mixed 1		0	0	
		0	x	2	2	
	Proc	✓	x	$\frac{1}{98}$	$\frac{1}{97}$	2/100

			% Def	[ed: must learn to count]
H	Major	29/(24+29)	55	
	Minor	6/(16+6)	27	
	Mixed	4/(8+4)	33	
PP	Major	3/(5+3)	37	
	Minor	1/(1+2)	33	
	Mixed	0/0	--	

## Column Titles

- ① License - license number
- ② R - region
- ③ H - hospital PP - private practice or clinic
- ④ M - a major change that would require an amendment under proposed part 35  
A - authorized users R - radiation safety officer  
T - therapy physicist L - location  
D - new group or additional source or method  
I - increase inventory M - miscellaneous, see note
- ⑤ Def - the request was or was not deficient  
O ✓ - no deficiency, issued  
✓ ✓ - deficient, finally issued  
✓ O - deficient, abandoned  
the calendar days between NRC's receipt of the request and final action are noted
- ⑥ Proc - a minor change that the licensee could make under proposed part 35. see table for key.
- ⑦ Def - O ✓ - no deficiency, issued  
✓ ✓ - deficient, finally issued  
✓ O - deficient, abandoned  
M O - major deficiency, abandoned  
the calendar days between NRC's receipt of the request and final action are noted

## Column 6 - Procedures

- |  |    |
|--|----|
| 1 - change in rooms layout                           | 21 |
| 7 - replacement equipment                            | 5  |
| 9 - calicheck or other eqpt QA procedure             | 11 |
| <del>10 - transfer materials between hospitals</del> |    |
| <del>11 - film badge company change</del>            |    |
| 2 - alternate supplier or contractor                 | 8  |
| 3 - alternate handling procedure                     | 6  |

87 hospitals

13 priv prac

- 1 referenced Iowa file for one of two MD's -- Iowa doesn't release its records.
- 2 not yet filed
- 3 did not submit any supporting info. when info was requested by phone, we received a complete, non-deficient request.
- 4 mobile service wanted to store material @ client location and wanted visiting all conditions. neither were granted, though the request was supported by the right language
- 5 extend klt therapy licence 90 days, <sup>increased out of</sup> U-235 for sk/dng
- 6 name change, address change
- 7 transfer subs between licenses
- 8 Amoxicillin wand
- 9 licence didn't submit complete training history, so a modified permission was issued (less than originally requested but not grossly deficient)
- 10 new klt therapy unit to replace old one, same source

# Part 35 License Amendments to Feb 85

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① License	② R	③ H	④ PP	⑤ ART	⑥ Def	⑦ Proc	⑧ Det	⑨ Cide		
14 09883 01	3	✓		A-2	1142			535		
14 15009 01	3	✓		A-2	1143			403		
14 19391 01	3	✓								NVE
14 17927 01	3	✓								NVE
13 16979 01	1	✓				1	0164	NR		
13 13604 01	3	✓								NVE
13 20449 01	3	✓								NVE
13 17073 01	3	✓								NVE
13 16552 01	3	✓								NVE
13 14819 01	3	✓				1	018	105		
13 10462 01	3	✓		M	0154			314		
12 20235 01	3	✓								NVE
12 17959 01	3	✓								NVE
12 17786 01	3	✓								NVE
12 16732 01	3	✓								NVE
12 15531 02	3	✓		L	1188			94		
12 10943 02	3	✓								NVE
12 05640 01	3	✓								NVE

U.S. GPO: 1973-544-470/1112

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February 85

# Pict 35 License Amendments in Feb 85 p 2

① License	② R	③ H	④ PP	⑤ ART	⑥ Def	⑦ Proc	⑧ Def	⑨ Peds											
12 03332 03	3	✓																	NVF
12 01610 02	3	✓																	NVF
02 01709 04	1	✓																	NVF
09 12153 02	1	✓																	NVF
09 09495 01	1	✓																	NVF
4 January 85																			
24 18040 01	3	✓																	NVF
24 12699 01	3	✓																	NVF
24 01239 09	1	✓																	NVF
21 20279 01	3	✓																	NVF
21 18523 01	3	✓																	NVF
21 12899 01	3	✓																	NVF
21 12829 01	3	✓																	NVF
21 04109 16	2	✓																	NVF
29 21382 01	1	✓																	NVF
29 17925 01	1	✓																	NVF
29 16384 01	1	✓																	NVF
29 12855 01	1	✓																	NVF



# Part 35 License Amendments to Feb 85 p 3

① License	② R	③ H	④ PP	⑤ H	⑥ R	⑦ T	⑧ Def	⑨ Proc	⑩ Def	⑪ Peds		
29 07987 02	1	✓		A	✓	✓	42			156		
29 05139 03	1	✓		A	✓	✓	22	3	0 ✓	22	389	
29 02575 01	1	✓		A	✓	✓	154				469	
20 14868 01	1	✓		A	✓	✓	31				NR	
12 19658 01	3	✓	✓	L	✓	✓	54				PP-0	
12 13568 02	3	✓	✓	A-6	✓	✓	180				PP-0	NVF
12 10094 01	3	✓										NVF
12 03415 02	3	✓		M	✓	✓	142				437	
12 02501 03	3	✓										NVF
12 00963 02	3	✓						2	✓	✓	88	479
08 07342 03	1	✓		M	✓	✓	68				262	
02 03075 07	1	✓		A-2	✓	✓	153				470	
18 03345 05	1	✓		A	✓	✓	172				300	
13 20491 01	3	✓	✓	A-5	✓	✓	278				PP-0	
24 15046 01	3	✓		A	✓	✓	271		0 ✓	27	159	
34 13663 01	3	✓										NVF
34 02176 01	3	✓		A	✓	✓	41				601	



# Part 35 License Amendments

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① License	② R	③ H	④ PP	⑤ Major	⑥ Def	⑦ Proc	⑧ Def	Reds			
34 01131 03	3	✓									NVE
56 12134 01	5	✓		"M"	✓✓58			150			NVE
45 14382 01	2	✓									NVE
45 16391 01	2	✓		A"m	✓✓69			NR			
48 16485 01	3	✓				9	0133	270			
48 01333 01	3	✓		A	0149			NR			
37 23451 01	1	✓		R.I		1	✓✓90	NR			
37 16724 01	1	✓		A	✓✓25			24			
37 15400 01	1	✓		A.B	0176			226			
39 13509 01	1	✓		M	✓✓90			NR			
37 06864 06	1	✓				1	✓✓43	433			
37 01146 03	1	✓		A	0140			277			
35 13127 01	4	✓				1	✓✓89	366			
37 00896 03	1	✓		A	✓✓75			NR			
35 00376 05	4	✓				2	0139	333			
24 00481 05	3	✓		R	✓✓73			110			
35 16184 01	4	✓		A-2"	✓✓99			101			
24 17205 01	3	✓		A	0128			144			

# Part 35 License Amendments

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① License	② K	③ H	④ PP	⑤ Major	⑥ Def	⑦ Proc	⑧ Def	⑨ Rids		
24 17037 02	3	✓				9	01 23	98		
24 16330 01	3	✓		AK	01 41			105		
37 13666 01	1	✓				3	01 28	220		
37 09463 01	1	✓				1	01 34	352		
37 02385 01	1	✓		M <sup>s</sup>	01 4			232		
37 00432 02	1	✓		A	01 36			NR		
37 15471 01	1	✓				29	01 43	NR		
35 13157 01	4	✓				9	01 42	366		
35 01164 02	4	✓		A	11 95			314		
45 16231 01	2	✓		A	11 55			NR		
45 15249 01	2	✓		LN <sup>8</sup>	11 73			470		
45 05594 01	2	✓		A	11 68			330		
45 00986 01	2	✓		AR		1	01 23	347		
44 11345 02	1	✓		M <sup>6</sup>	11 57			NR		
37 17164 01	1	✓				92	01 14	91		
21 03835 01	3	✓		A	01 37			NR		
22 00015 02	3	✓		A-2	11 194			NR		
21 03298 05	3	✓		RA	11 170	1		916		

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# Part 35 License Amendments

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① License	② R	③ H	④ PP	⑤ Major	⑥ Def	⑦ Proc	⑧ Def	⑨ Pub		
20 18449 01	1		1	A-2	1/99			PP-0		
13 01631 06	3	1		M <sup>10</sup>	1/77			NR		
12 20436 01	3	1		A-2	01/30			NR		
21 20416 01	3		1	L	01/34			PP-0		
21 18523 01	3	1		R	01/30			NR		
21 17122 01	3		1			193	01/30	PP-0		
21 14244 01	3	1		M <sup>6</sup>	01/44			77		
14 14623 01	3	1		A		1	01/31	NR		
13 16457 01	3	1		B		1	1/259	845		
09 04233 03	2	1		RBL		273	1/198	1113		
07 16167 01	1		1			7	1/33	PP-0		
06 18121 01	1		1	L	1/101			PP-0		
06 08544 01	1	1				1	01/71	435		
18 07561 01	1	1		AR	01/07			561		
18 07561 01	1	1				9	01/16	561		
12 18793 01	3	1		A	1/53			196		
12 06543 01	3	1		A		1	1/127	280		
12 01628 01	3	1				951	1/117	NR		

# Pvt + 35 License Amendments

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① License	② R	③ H	④ PP	⑤ Major	⑥ Def	⑦ Proc	⑧ Def	⑨ Def	⑩ Def
12 01678 01	3	✓		AR	1174				NR
12 00074 08	3	✓		A	0135				900
12 00663 03	3	✓				1	1127		180
12 02663 03	3	✓		A	0115				180
42 01670 01	3	✓		A	1187				250
53 13061 01	5		✓	A	0111				PP-0
53 17797 01	5	✓				3	0129		NR
12 02349 05	3	✓		L	1121				566
47 21166 01	2	✓		R		7291	0121		96
47 21189 01	2	✓		R		7291	0155		47
08 16752 01	1	✓				92	0117		81
06 04499 01	1		✓	L	0134				PP-0
12 02206 01	3	✓		R	0136				206
08 23411 01	1		✓	A	0126				PP-0
12 01167 02	3	✓		L	1131				832
07 02309 01	1	✓		L		19	1185		243
07 17792 01	3	✓		A	11262				NR

# Part 35 License Amendments

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① License ② R ③ H ④ Major ⑤ Def ⑥ Proc ⑦ Def