



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

AA73-1  
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B.10

*Kraft*

December 11, 1981

MEMORANDUM FOR: Vandy L. Miller, Chief  
Material Licensing Branch

William J. Walker, Ph.D., Section Leader  
Medical and Academic Section  
Material Licensing Branch

John E. Glenn, Ph.D., Section Leader  
Region I Licensing Section

Technical Staff  
Medical Licensing Sections  
Material Licensing Branch

FROM: Bruce S. Mallett, Ph.D., Section Leader  
Region III Licensing Section

SUBJECT: TRANSFER OF RADIOACTIVE MATERIALS BETWEEN NRC LICENSED  
MEDICAL INSTITUTIONS - SITUATIONS THAT DO NOT REQUIRE  
THE TRANSFEROR TO OBTAIN A DISTRIBUTION LICENSE

Section 35.14(b) of 10CFR Part 35 requires group medical licensees to obtain radioactive materials from institutions that possess a distribution license in accordance with Section 32.72 of 10CFR Part 32. During the past year, however, there have been a number of requests by medical licensees to receive radioactive materials from an institution that does not possess a distribution license. In order to establish a standard review plan that would allow for the approval and a uniform review of these requests, representatives of Region I, Region III, and Headquarters Medical Licensing Sections held a workshop on November 20, 1981. The following is a summary of the review criteria proposed at that workshop.

## APPLICABILITY

Since the review and approval of requests of this nature requires an exemption from the requirements of Section 35.14(b) of 10CFR Part 35, these requests shall be reviewed on a case-by-case basis and be limited to the following situations:

1. Transfers between no more than three institutions.
2. Transfers between more than two institutions shall be in only one direction (i.e. from one institution to the other two).
3. Transfers between two institutions may be in both directions.
4. The agent transferring the materials shall be one of the participating institutions or a common carrier and not a "third party". *ONE inst must accept exp for transport*
5. All participating institutions shall have the proper procedures established to safely handle and be licensed to possess and use the material that will be transferred.
6. Any form of radioactive material may be transferred.
7. If Mo-99/Tc-99m generators are to be transferred, they shall not be altered from their original state and past their expiration date. *info. must be (give words)*
8. Transfers involving therapeutic levels of radiopharmaceuticals shall be limited to the transfer of prepared radiopharmaceuticals received from an institution licensed in accordance with 10CFR 32.72 (i.e. licensees will not be permitted to receive 100 mCi of iodine-131 as a prepared dose for therapy and break down that dose into smaller portions for transfer to other institutions). *See chapter 32.72*
9. Transfers from one institution to another institution operating ~~as~~ a mobile van shall not be allowed. *mobile van*
10. Transfers involving the redistribution of unaltered packages of prepared radioactive materials shall be allowed.

Licensees shall be required to obtain distribution licenses if they desire to transfer radioactive material to medical institutions in situations other than those listed above (e.g. transfers between more than three institutions).

INFORMATION THAT SHOULD BE SUBMITTED BY APPLICANTS

1. Confirmation that receipt and package opening procedures shall be at least equivalent to those outlined in Appendix F of Regulatory Guide 10.8, October 1980.
2. Concurrence from the administrator of each participating institution.
3. If the request is for redistribution to general licensees, the transferor should be advised to check for the proper labeling and to not alter the packages.
4. For transfers involving Group VI sources, procedures for maintaining source accountability at all participating institutions.
5. Confirmation that vehicles used for transporting materials will be surveyed for contamination.
6. Safety measures to be used in transporting the radioactive materials in the applicants' vehicles (e.g. security against unauthorized removal, away from passenger compartment, absorbent paper, lead shields, etc.).
7. Identification of the individuals who will transport the materials, and the training they will receive. This training should, as a minimum, include all the items outlined in 10 CFR 19.12 and decontamination procedures in case of spills.
8. Emergency procedures to be followed in case of accidents involving spills or loss of radioactive materials.
9. Identification of each type and quantity of radiopharmaceutical that will be transported (e.g. unit doses of Tc-sulfur colloid, etc.).

*Bruce S. Mallett*

Bruce S. Mallett, Section Leader  
Region III Licensing Section