David S. Gooden, Ph.D.
CERTIFIED RADIOLOGICAL PHYSICIST
CERTIFIED HEALTH PHYSICIST
6161 South Yale Ave.
Tulsa, Oklahoma 74177
Phone: 918 494-1444
or 918 496-0080

PHYSICS CONSULTATION IN:

DIAGNOSTIC X-RAY
RADIATION THERAPY
NUCLEAR MEDICINE
RADIOGRAPHY
INSTRUMENTATION

LEAK TESTING
SHIELDING DESIGN
RADIATION SAFETY
PERSONNEL MONITORING
NRC LICENSE APPLICATIONS
STATE AND FEDERAL COMPLIANCE

December 5, 1985

Nuclear Regulatory Commission
Region IV
Material Radiation Protection Section
611 Ryan Plaza Drive - Suite 1000
Arlington, Texas 76011

License: 35-17926-02
Docket: 30-20273/85-01

Dear Sirs:

Thank you for your letter of November 22, 1985, requesting additional information on our response to a Notice of Violation dated August 19, 1985. Attached you will find that all Physicians using radioactive materials at Doctor's Hospital are now listed on our license. This is a viable document available for review by your inspection personnel. A copy of the newly amended license is included with this correspondence.

In addition, we have inserted a procedure into our procedures manual stating the specific action to be taken for doctors wishing to use radioactive materials and not appearing on the license. A copy of this document is also enclosed with this correspondence.

IC-197/85

We feel that we are now in full compliance with Item A of your Notice of Violations.

If we can supply additional information, please contact us.

Sincerely,

David S. Gooden

David S. Gooden, Ph.D.
Radiological Physicist
Consultant to Doctor's Medical Center

APPROVAL:

Mr. Harvey Shapiro, Administrator
Doctor's Medical Center

Dr. Pat Haney, M.D., Radiologist
Doctor's Medical Center

PROCEDURE: PHYSICIANS WHO ARE AUTHORIZED TO USE RADIOACTIVE MATERIALS AT DOCTOR'S MEDICAL CENTER.

1. All positions listed on the present license of Doctor's Medical Center may use those radioactive materials for which they are licensed.

2. Physicians wishing to use radioactive materials under the supervision of one of our listed Physicians must do so only with the expressed permission of the listed Physician. This authorization will be transferred directly to the Chief Technologist in charge of the Radiology Department and the Department of Nuclear Medicine.

3. The use of radioactive materials by a visiting Physician must meet all applicable items addressed in our license.

David S. Gooden

David S. Gooden, Ph.D.
Radiological Physicist
Consultant to Doctor's Medical Center

Dr. Pat Haney, M.D., Radiologist
Doctor's Medical Center

Bill Dishman RT

Mr. Bill Dishman, Chief Technologist
Doctor's Medical Center

Mr. Harvey Shapiro, Administrator
Doctor's Medical Center

NRC Form 374
(5-84)

U.S. NUCLEAR REGULATORY COMMISSION

Amendment No. 02

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 40 and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee	
1. AMISUB, Inc. dba Doctor's Hospital or Doctor's Medical Center 2. 2323 South Harvard Avenue Tulsa, Oklahoma 74114	In accordance with letter dated September 6, 1985 3. License number 35-17926-02 is amended in its entirety to read as follows: 4. Expiration date March 31, 1989 5. Docket or Reference No. 030-20273

6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Any byproduct material listed in Groups I and II of Schedule A, Section 35.100 of 10 CFR 35	A. Any radiopharmaceutical listed in Groups I and II of Schedule A, Section 35.100 of 10 CFR 35	A. As necessary for uses authorized in Subitem 9.A.
B. Any byproduct material listed in Group III of Schedule A, Section 35.100 of 10 CFR 35	B. Any form listed in Group III of Schedule A, Section 35.100 of 10 CFR 35	B. 2 curies of each byproduct material authorized in Subitem 6.B.
C. Any byproduct material listed in Group IV of Schedule A, Section 35.100 of 10 CFR 35	C. Any radiopharmaceutical listed in Group IV of Schedule A, Section 35.100 of 10 CFR 35	C. As necessary for uses authorized in Subitem 9.C.
D. Any byproduct material listed in Section 31.11(a) of 10 CFR 31	D. Any	D. 10 millicuries of each byproduct material authorized in Subitem 6.D.
E. Iodine-131	E. Iodide	E. 50 millicuries

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MATERIALS LICENSE
SUPPLEMENTARY SHEET

License number: 35-17926-02
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Amendment No. 02

F. Xenon-133	F. Gas or gas in solution that is the subject of an active (i.e., not withdrawn or terminated) "New Drug Application" (NDA) approved by FDA or an active (i.e., not withdrawn, terminated or on "clinical hold") "Notice of Claimed Investigational Exemption for a New Drug" (IND) that has been accepted by FDA	F. 250 millicuries
G. Cesium-137	G. Sealed source	G. 10 millicuries

9. Authorized use

A. Any diagnostic procedure listed in Groups I and II of Schedule A, Section 35.100 of Title 10, Code of Federal Regulations.

B. Preparation and use of radiopharmaceuticals for any diagnostic procedure listed in Group III of Schedule A, Section 35.100 of Title 10, Code of Federal Regulations.

C. Any therapeutic procedure listed in Group IV of Schedule A, Section 35.100 of Title 10, Code of Federal Regulations.

D. In vitro studies.

E. Treatment of thyroid carcinoma.

F. Blood flow or pulmonary function studies.

G. Standard for instrument calibration.

CONDITIONS

10. Licensed material shall be used only at 2323 South Harvard Avenue, Tulsa, Oklahoma.

MATERIALS LICENSE
SUPPLEMENTARY SHEET

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Docket or Reference number
030-20273

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11. The licensee shall comply with the provisions of Title 10, Chapter 1, Code of Federal Regulations, Part 19, "Notices, Instructions and Reports to Workers; Inspections" and Part 20, "Standards for Protection Against Radiation."

12. Licensed material listed in Item 6 above is authorized for use by, or under the supervision of, the following individual(s) for the materials and uses indicated:

W. P. Haney, M.D.	Groups I, II, III, and IV Xenon-133 In vitro studies Iodine-131 as iodide for treatment of thyroid carcinoma Cesium-137
R. F. Barbee, M.D.	Groups I, II, III, and IV Xenon-133 In vitro studies Iodine-131 as iodide for treatment of thyroid carcinoma Cesium-137
John T. Forsythe, M.D.	Groups I, II, III, and IV Xenon-133 In vitro studies Cesium-137
Richard Laughlin, M.D.	Groups I, II, and III Xenon-133 In vitro studies Iodine-131 as iodide for treatment of hyperthyroidism, cardiac dysfunction, and thyroid carcinoma
Jack J. Mocnik, M.D.	Groups I, II, and III Xenon-133 In vitro studies Iodine-131 as iodide for treatment of hyperthyroidism, cardiac dysfunction, and thyroid carcinoma

David G. Schwarz, M.D.	Groups I, II, and III Xenon-133 In vitro studies Iodine-131 as iodide for treatment of hyperthyroidism and cardiac dysfunction
Emmet L. Tate, M.D.	Groups I, II, and III Xenon-133 In vitro studies Iodine-131 as iodide for treatment of hyperthyroidism and cardiac dysfunction
Reese E. James, M.D.	Groups I, II, and III Xenon-133 In vitro studies
Brian Cosmann, M.D.	Groups I, II, and III Xenon-133 In vitro studies
Daniel C. Dennehy, M.D.	Groups I, II, and III Xenon-133 In vitro studies

13. Licensed material shall be used in accordance with the provisions of Section 35.14(b)(c)(e) and (f) of Title 10, Code of Federal Regulations.

14. A. (1) Each sealed source containing licensed material, other than hydrogen-3, with a half-life greater than 30 days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed 6 months. In the absence of a certificate from a transferor indicating that a test has been made within 6 months prior to the transfer, a sealed source received from another person shall not be put into use until tested.

(2) Notwithstanding the periodic leak test required by this condition, any licensed sealed source is exempt from such leak tests when the source contains 100 microcuries or less of beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.

14. (continued)

(3) The periodic leak test required by this condition does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another person unless they have been leak tested within 6 months prior to the date of use or transfer.

B. The test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. The test sample shall be taken from the sealed source or from the surfaces of the device in which the sealed source is permanently mounted or stored on which one might expect contamination to accumulate. Records of leak test results shall be kept in units of microcuries and maintained for inspection by the Commission.

C. If the test reveals the presence of 0.005 microcurie or more of removable contamination, the licensee shall immediately withdraw the sealed source from use and shall cause it to be decontaminated and repaired or to be disposed of in accordance with Commission regulations. A report shall be filed within 5 days of the test with the U. S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Dr., Suite 1000, Arlington, Texas 76011, describing the equipment involved, the test results, and the corrective action taken.

D. Tests for leakage and/or contamination shall be performed by the licensee or by other persons specifically authorized by the Commission or an Agreement State to perform such services.

15. Sealed sources containing licensed material shall not be opened.

16. For a period not to exceed 60 days in any calendar year, a visiting physician is authorized to use licensed material for human use under the terms of this license, provided the visiting physician:

A. Has the prior written permission of the hospital's administrator and its Radiation Safety Committee, and

B. Is specifically named as a user on a Nuclear Regulatory Commission license authorizing human use, and

C. Performs only those procedures for which he is specifically authorized by a Nuclear Regulatory Commission license.

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16. (continued)

The licensee shall maintain for inspection by the Commission, copies of the written permission specified in Subitem A above and of the license(s) specified in Subitems B and C above. These records shall be maintained for 5 years from the time the licensee grants its permission under Subitem A above.

17. The licensee is authorized to hold radioactive material with a physical half-life of less than 65 days for decay-in-storage before disposal in ordinary trash provided:

A. Radioactive waste to be disposed of in this manner shall be held for decay a minimum of 10 half-lives.

B. Prior to disposal as normal waste, radioactive waste shall be monitored to determine that its radioactivity cannot be distinguished from background with typical low-level laboratory survey instruments. All radiation labels will be removed or obliterated.

C. Generator columns shall be segregated so that they may be monitored separately to ensure decay to background levels prior to disposal.

18. Patients containing iodine-131 for the treatment of thyroid carcinoma (or patients containing therapeutic quantities of gold-198) shall remain hospitalized until the residual activity is 30 millicuries or less.

19. Except as specifically provided otherwise by this license, the licensee shall possess and use licensed material described in Items 6, 7, and 8 of this license in accordance with statements, representations, and procedures contained in application dated November 16, 1983, and letter dated February 9, 1984. The Nuclear Regulatory Commission's regulations shall govern the licensee's statements in applications or letters, unless the statements are more restrictive than the regulations.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date NOV 29 1985

By Original Signed By
C. L. Cain
Nuclear Materials Safety Section
Region IV
Arlington, Texas 76011