

FCML:PCV
(16075)
030-00462

JAN 19 1984

Allegheny Health, Education and
Research Corporation
ATTN: Mr. John H. Westerman
President
320 East North Avenue
Pittsburgh, PA 15212

Gentlemen:

This is in reference to your October 11, 1983 letter with its enclosed application requesting authorization to use a cobalt-60 source in an AECL Eldorado Super G teletherapy unit for calibration of instruments. In order for us to continue our review of your request, we need the following additional information:

1. Item 1.a. of Form NRC-313T shows that the name and mailing address of your organization are somewhat different from that shown in Items 1 and 2 of your current license. Please confirm that you want us to delete the Division and Department names currently used on your license or provide an up-to-date mailing address.
2. Please provide a complete written description of the current location of your Picker Model 6296 teletherapy unit. Your description should include such identification as street address, building name, wing name, floor, room number, etc. We need this information in order to revise Condition 10. of your license.
3. We understand that the AECL Eldorado Super G unit and source will be used as a calibration source in your AAPM-Accredited Dosimetry Calibration Laboratory.
 - a. However, we are not sure for what other activities you wish authorization because, in response to Item 16 of the application form, you have said that the unit will be "used for non-human uses, principally (emphasis added) for the calibration of customers' dosimetry systems." We plan to authorize use of the cobalt-60 unit and source for calibration of both your own and your customers' instruments. Please confirm

8512180477 850215
REG1 LIC30
37-01317-02 PDR

"OFFICIAL RECORD COPY"

ML10

that this authorization is sufficient for your desired activities or provide clarifying information with regard to other activities that you plan to conduct.

- b. We understand that you will be calibrating dosimetry systems used to make the full calibration measurements required by 10 CFR 35.21 and that your procedures have been reviewed and approved by AAPM. Please: (i) verify that our assumptions are correct or provide clarifying information and (ii) submit a copy of the calibration certificate that you will provide to your customers.
 - c. If you plan to calibrate other types of instruments (e.g., portable survey meters), please submit copies: (i) the procedures that you will follow and (ii) the calibration certificate that you will provide to your customers.
4. As a licensee authorized to use a "non-self-shielded" irradiator, you will have to comply with the requirements of 10 CFR 20.203(c)(6). It is not clear from your application that you have described sufficient controls and procedures to comply with all aspects of this regulation. For example, although you have described a door interlock system, it is not clear if the door interlock system that you described applies to only one of the doors to the facility or if it applies to doors at both entrances to the facility. If the interlock system does in fact apply to both entrances to the facility, it is not clear that both doors would need to be closed in order for the unit to be operational and that opening either one of the two doors would cause the source to go to the "off" position. In addition, you do not appear to have addressed the requirements in Subparagraphs (ii), (iv), (vi) and (vii). To clarify these matters, please consider each of the subparagraphs [(i)-(viii), inclusive] in 10 CFR 20.203(c)(6) and clearly explain how you will comply with this portion of NRC's regulations.
5. Please describe how you will prevent use of the AECL Eldorado Super G unit by unauthorized personnel.
6. Please submit a copy of the procedures to be followed if the source fails to return to the fully "off" position or if some other emergency occurs.
7. Please confirm that at least one of your proposed authorized users will be physically present when the AECL Eldorado G teletherapy unit is being used.
8. In response to Item 15 of the application form, you have indicated that mechanical restraints will permit the primary beam to be directed only 90° toward the east wall, 4 feet from the floor and the beam "will only be moved for realignment, replacement or radiation safety reasons." Please explain in greater detail what you mean by the quoted material.

Allegheny Health, Education and
Research Corporation

3

We will continue our review of your application upon receipt of this information.
Please reply in duplicate and refer to Control No. 16075.

Sincerely,

Patricia C. Vacca
Material Licensing Branch
Division of Fuel Cycle and
Material Safety

Enclosures: 10 CFR Parts 20 and 35

CWPB:SS
5520
1/18/84

FCML
PCVacca:mw
1/19/84