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AUG 8 1985

Saint Vincent Carmel Hospital
ATTN: James E. Durlacher
Radiation Safety Officer
13500 North Meridian Street
Carmel, IN 46032-4903

Gentlemen:

We have reviewed your application dated June 29, 1985 requesting a byproduct material license and find that we will need additional information as follows:

- ✓ 1. You have indicated that your survey meter(s) will be calibrated according to the procedures in Appendix D. These procedures require a calibration source of sufficient activity to provide readings of approximately 1 roentgen per hour at 20 cm. Identify the source that you will use by nuclide, activity, and calibration accuracy.

If you do not have adequate calibration sources available to you, you may return the instrument(s) to the manufacturer for calibration or employ the services of a consultant in your area. If you intend to have a consultant calibrate your survey meters, you should contact the consultant to determine if procedures for operating a commercial calibration service have been filed with the NRC. If so, submit the name, address, and NRC license number of the consultant. If not, you should obtain and submit the step-by-step procedures (including a description of the sources) that the consultant will use.

- ✓ 2. You have indicated that you will calibrate your dose calibrator according to the procedures in Appendix D. In order to follow the procedures in Appendix D, you will need reference standards of high, intermediate, and low energy (e.g., cesium-137, barium-133, and cobalt-57). The source activity levels should approximate those levels normally encountered in clinical use (e.g., cobalt-57: one millicurie or more). Please identify the three sources that you will use. State nuclide, activity, and calibration accuracy.
- ✓ 3. Describe your procedures for ordering radioactive materials, for receipt of materials and for notification of responsible persons upon receipt of radioactive materials. These procedures should be adequate to ensure that possession limits are not exceeded, that radioactive materials are secured against unauthorized removal at all times, and that radiation levels in unrestricted areas do not exceed the limits specified in Section 20.105 of 10 CFR Part 20.

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4. Please supplement your receipt procedures to include precautions to be followed in the event of receipt of byproduct material packages during off-duty hours. As a minimum, these procedures should include:
 - a. designation of a central receiving/storage point
 - b. designation of responsible individual(s)
 - c. precautions to be followed in the event of receipt of a damaged byproduct material package, including:
 - (i) notification of the R.P.O.
 - (ii) retaining delivery personnel until it can be determined that neither they nor their delivery vehicle is contaminated
 - (iii) proper handling procedures for packages suspected of being contaminated

Refer to Regulatory Guide 10.8, Appendix E for example procedures.

5. Describe your procedures for examining incoming packages for leakage, contamination or damage, and for safely opening packages in accordance with Section 20.205 of 10 CFR Part 20. It is recommended that, as a minimum, these include instructions to wear gloves, monitor the packages before opening, and monitor the packing material for contamination after opening. Refer to Regulatory Guide 10.8, Appendix F for acceptable procedures.
6. Please note that 10 CFR Part 35 has been revised effective October 12, 1982. This revision requires a representative of the nursing staff to be on the Medical Isotopes Committee. In view of this new requirement, you should appoint a member of your nursing staff to your Medical Isotopes Committee immediately.
7. Please submit a copy of your ALARA Program as requested in NRC's June 16, 1980 letter (copy enclosed). If you have chosen to adopt the Model ALARA Program attached to the June 16 letter, you may simply do the following:
 - a. Fill in the blanks on the first page of the program.
 - b. Have a representative of your management sign the program on the last page.
 - c. Submit the signed Model ALARA Program.

Once submitted and accepted by our office, your program will be incorporated as a condition of your NRC license.

8. Ancillary personnel (clerical, nursing, housekeeping, security, etc.) whose duties may require them to work in the vicinity of radioactive material (whether escorted or not) need to be informed about radiation hazards and appropriate precautions. Outline your method to assure that these employees receive the necessary instructions. Confirm that this instruction will be given both initially and annually thereafter on a refresher basis.
9. You should measure the airflow rates in the ventilation systems for xenon-133 at least semiannually to determine that system performance meets the specifications stated in your letter. Please confirm.
10. Describe the frequency and method that you will use to test the xenon-133 charcoal trap efficiency. Identify at what point you will replace the trap. As a minimum, the trap should be tested at least monthly and be maintained at least 80% efficient.

If you have any questions or require clarification on any of the information stated above, you may contact us at (312) 790-5625.


We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, and refer to Control Number 19084.

Sincerely,

Original Signed By
Evelyn R. Matson
Materials Licensing Section

Enclosure: June 16, 1980 ALARA Letter

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Matson/cm
08/06/85