



# HOSPITAL EPISCOPAL SAN LUCAS

CALLE GUADALUPE FINAL - APARTADO 2027

RECEIVED PONCE, PUERTO RICO 00731

(809) 844-0040

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U.S. NRC REG  
NRC REGISTRATION

July 9, 1980

Ponce, Puerto Rico

00731

U.S. Nuclear Regulatory Commission  
Material Licensing Branch  
Division of Fuel Cycle and Material Safety  
Washington, D.C. 20555

RE: Control No. 01041

Gentlemen:

The following information is in reference to your request in relation to our licence no 52-16061-01 renewal application.

Each item in your letter is answered accordingly:

1. About item 6.A, Form NRC-313M, your understanding is correct.
2. With regard to our request for 10 millicuries of the materials listed in section 31.11 the following comments may clarify our position at the present time. Our Hospital is in the process of being remodeled. At the present time we do not consider our Nuclear Medicine laboratory be in condition to increase the use of other nuclides or others than iodine 131 and technetium 99. For this reason and until our new facilities are ready, please discard our request for 10 millicuries of materials listed in section 31.11.
3. We also have available a high range survey meter. We have Victoreen-CuticPie model 740D. The highest level range is 25,000mr/hr.
4. Facilities for use and storage of material.
  - a. Each new generator is located behind a lead shield door in a wall type cabinet. Readings outside that cabinet are always background. After the generator is used it is surveyed and located at a different level in the same cabinet. After ten or more half lives the R.S.O. (our consultant) breaks the generators and make a survey of

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the radioactive columns in order to dispose of the lead. Columns are maintain for a longer time.

- b. Our laboratory has a leaded refrigerator of about 2'x4' feet.
- c. The only radioactive waste we maintain are the TC-99 generators. For small amounts of TC 99 or iodine 131 capsules we have a leaded nest of about 3 ft. wide one (1) ft. height and 3 ft long. The area is surveyed weekly by our technician and also by the consultant. Records has been checked by compliance inspectors from Region II-N.R.C.
- d. Preparation and dispensing of Group III radiopharmaceuticals is made also at the leaded nest.

All laboratory walls are made with solid concrete of about six inches thick. All adjacent areas are surveyed and no readings found.

- 5. We do not consider at the present time it is necessary to include a nurse in the isotopes committee. Our workload and program is so small that our present committee is large enough.
- 6. A finger type dosimeter has been requested for our technician in addition to her whole body film badge.
- 7. Our personnel training program includes radiation safety. We have an active continuous education program for all health personnel required by law. Also the Joint Commission requires continuous education programs for all employees. Each new employee is required to receive orientation in safety including radiation safety. Also our laboratory maintains an up to day safety manual that is reviewed annually. In addition our consultant invites all technical personnel to attend lectures given to X ray technicians about radiation safety.
- 8. Our laboratory will implement as necessary the bioassay guide you submitted for consideration. In our case we use iodine 131 capsules all the time. The use of liquid iodine is rarely used due to our limitations. No treatment has been done lately.
- 9. Our Tc-99 generators are disposed as you indicates. This has been corroborated during many years by N.R.C. inspectors



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We hope the above information will clarify and help you in the process of reviewing our license renewal.

Sincerely yours,

Mr. Manuel J. Vázquez

Administrator

Saint Luke's Hospital

Box 2027

Ponce, Puerto Rico

00731

MV/ir