

DEC 11 1985

License No. 06-00092-05
Docket No. 030-01237
Control No. 118038

V. A. Medical Center
ATTN: Albert M. Blecich
Medical Center Director
West Spring Street
West Haven, Connecticut 06516

Gentlemen:

This is in reference to your application dated August 10, 1984 to renew License No. 06-00092-05. In order to continue our review, we need the following additional information:

1. We have reviewed Mr. Motzer's qualifications and find his credentials lacking in the area of formal training and experience with research type radiochemicals.

10 CFR 33.13(c)(2) requires that an applicant for a broad scope Type A license have a radiological safety officer (RSO) who is qualified by training and experience in radiation protection and available for consultation. It is the current policy of the NRC that in order to meet the above criteria a RSO should have a minimum of a bachelor's degree in radiological health or equivalent and several years experience using and supervising the use of all materials under a license. Since your license includes research materials the RSO should have experience using and supervising the use of these materials as well as nuclear medicine radiopharmaceuticals.

Since Mr. Motzer does not have a bachelor's degree he may obtain equivalency by taking at least a 5 week applied health physics training course of the type offered by Oak Ridge Associated Universities, Oak Ridge, Tennessee to name one. This course contains at least 200 hours in basic radiological health physics.

Alternatively you may:

- A. Submit the name of a qualified individual to fulfill this position,
OR
- B. Request that your license be reduced to a specific limited scope license.

B604030603 B60324
REG1 LIC30
06-00092-05

PDR

OFFICIAL RECORD COPY

ML223/LTR - 0001.0.0
12/10/85

ML19

2. With regard to the Radiation Safety Officer (RSO); please specify the duties, responsibilities and authority of the R.S.O. The R.S.O., must have authority to stop all use of radioactive material where violations of NRC regulations, license conditions or unsafe conditions occur. Typically, the R.S.O.'s duties and responsibilities should consider the following:
- a. General surveillance over all activities involving radioactive material, including routine monitoring and special surveys of all areas in which radioactive material is used.
 - b. Determining compliance with NRC rules and regulations, license conditions, and the condition of project approval specified by the radiation safety committee.
 - c. Monitoring and maintaining absolute and other special filter systems associated with the use, storage, or disposal of radioactive material.
 - d. Furnishing consulting services on all aspects of radiation protection to personnel at all levels of responsibility.
 - e. Receiving, delivering, and opening all shipments of radioactive material arriving at the institution and receiving, packaging, and shipping all radioactive material leaving the institution.
 - f. Distributing and processing personnel monitoring equipment, determining the need for and evaluation of bioassays, keeping personnel exposure and bioassay records, and notifying individuals and their supervisors of exposures approaching maximum permissible amounts and recommending appropriate remedial action.
 - g. Conducting training programs and otherwise instructing personnel in the proper procedures for the use of radioactive material prior to use, at periodic intervals (refresher training), and as required by changes in procedures, equipment, regulations, etc.
 - h. Supervising and coordinating the radioactive waste disposal program, including keeping waste storage and disposal records and monitoring effluents.
 - i. Storing all radioactive materials not in current use, including wastes.
 - j. Performing leak tests on all sealed sources.
 - k. Maintaining an inventory of all radioisotopes at the institution and limiting the quantity of radionuclides at the institution to the amounts authorized by the license. The inventory should include the name of the person responsible for each quantity of radioisotopes, where it will be used or stored, and the date the quantity was

delivered to that person. Items are removed from the inventory by showing how and when the radioisotope was disposed of.

1. The authority to terminate immediately a project that is found to be a threat to health or property.
- m. Maintaining other records not specifically designated above, e.g., receipt, transfer, and survey records as required by §30.51, "Records," of 10 CFR Part 30.
3. Regarding the RSO's responsibilities in the area of shipping of radioactive materials from your institution (including radioactive wastes). The NRC expects the RSO as the licensee's representative to do the following:
 - a. Maintain a current set of DOT and NRC regulations concerning the transfer, packaging, and transport of low-level radioactive waste material.
 - b. Maintain a current set of requirements (license) placed on the waste burial firm by the Agreement State of Nevada, South Carolina, or Washington before packaging low-level radioactive waste material for transfer and shipments to the Agreement State license. If a waste collection contractor is used, obtain the appropriate requirements from the contractor.
 - c. Designate, in writing, people in your organization who are responsible for the safe transfer, packaging, and transport of low-level radioactive material.
 - d. Provide management-approved, detailed operating procedures to all personnel involved in the transfer, packaging, and transport of low-level radioactive material. Attention should be given to controls on the chemical and physical form of the low-level radioactive material and on the containment integrity of the packaging.
 - e. Provide initial training and periodic retraining in the DOT and NRC regulatory requirements, the waste-burial license requirements, and in your operating procedures for all personnel involved in the transfer, packaging, and transport of radioactive material. Maintain a record of training dates, attendees, and subject material for future inspections by NRC personnel.
 - f. Provide initial training and periodic retraining to those employees who operate the processes that generate waste to ensure that the volume of low-level radioactive waste is minimized and that such waste is processed into acceptable chemical and physical form for transfer and shipment to a low-level radioactive waste burial facility.

- g. Establish and implement a management-controlled audit of all transfer, packaging and transport activities to provide assurance that personnel, procedures and process and transport equipment are functioning properly.
- h. Perform semiannually a management-controlled audit of your activities associated with the transfer, packaging, and transport of low-level radioactive waste. Maintain a record of all audits for future inspection by NRC or DOT inspectors.
- i. Maintain on file for a least one year after a shipment, a complete documentation of tests and evaluations that all packages shipped complied with Type 7A specifications, if necessary, as required in DOT regulations in 49 CFR 173.465(a), and NRC regulations in 10 CFR 71.5.

Please clarify if the above are part of the RSO's responsibilities.

- 4. Please specify the testing and calibration frequency of the pocket dosimeters you intend to use for short interval monitoring. The NRC's guidance suggests calibration and leak rate testing at 3 month intervals in Regulatory Guide 8.4 enclosed.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 118038.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we shall assume that you do not wish to pursue your application.

Sincerely,

Original Signed By:
Jenny M. Johansen

Jenny M. Johansen, M.S.
Nuclear Materials Safety Section B
Division of Radiation Safety
and Safeguards

Enclosures:

- 1. 10 CFR Part 33
- 2. Regulatory Guide 8.4, Draft Appendix P
to Regulatory Guide 10.8

RI:DRSS
Johansen/mjh
12/11/85

OFFICIAL RECORD COPY

ML223/LTR - 0004.0.0
12/10/85