

## MATERIALS LICENSE

Amendment No. 25

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, 36, 39, 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.

OFFICIAL RECORD COPY

## Licensee

1. Wills Eye Hospital
2. 9th and Walnut Streets  
Philadelphia, Pennsylvania 19107

In accordance with the letter dated  
February 23, 1996,  
3. License Number 37-00783-04 is amended in  
its entirety to read as follows:

4. Expiration Date November 30, 2004

5. Docket or  
Reference No. 030-02964

6. Byproduct, Source, and/or  
Special Nuclear Material7. Chemical and/or Physical  
Form8. Maximum Amount that Licensee  
May Possess at Any One Time  
Under This License

A. Phosphorus 32

A. As identified in  
10 CFR 35.200

A. 10 millicuries

B. Sulfur 35

B. Any

B. 10 millicuries

C. Iodine 125

C. Any

C. 10 millicuries

D. Strontium 90

D. Sealed sources  
(Technical Operations  
Model M-1)D. 1 source not to exceed  
50 millicuries

## 9. Authorized use

- A. Diagnosis and localization of ocular tumors.
- B. and C. In-Vitro studies.
- D. For storage only.

## CONDITIONS

10. Licensed material may be used only at the licensee's facilities at 9th and Walnut Streets, Philadelphia, Pennsylvania.
11. The Radiation Safety Officer for this license is Theodore W. Sery, Ph.D.
12. Licensed material listed in Item 6 above is only authorized for use by, or under the supervision of, the following individuals for the materials and uses indicated:

Authorized UsersMaterial and Use

Jerry Shields, M.D.

Phosphorus 32 for radiopharmaceutical procedures  
approved in 35.200

Larry A. Donoso, M.D.

Iodine 125, Sulfur 35

Theodore W. Sery, Ph.D.

Strontium 90

9706240128 970324  
PDR ADOCK 03002964  
C PDR



ML10

**MATERIALS LICENSE  
SUPPLEMENTARY SHEET**

License Number

37-00783-04

Docket or Reference Number

030-02964

Amendment No. 25

13. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d), 40.36(b), and 70.25(d) for establishing financial assurance for decommissioning.
14. The licensee is authorized to transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."
15. The licensee shall not use licensed material in or on human beings except as provided otherwise by specific condition of this license.
16. 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. Waste to be disposed of in this manner shall be held for decay a minimum of ten half-lives.
  - B. Before disposal as ordinary trash, the waste shall be surveyed at the container surface with the appropriate survey instrument set on its most sensitive scale and with no interposed shielding to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.
  - C. A record of each such disposal permitted under this License Condition shall be retained for three years. The record must include the date of disposal, the date on which the byproduct material was placed in storage, the radionuclides disposed, the survey instrument used, the background dose rate, the dose rate measured at the surface of each waste container, and the name of the individual who performed the disposal.
17. Notwithstanding the requirements of 10 CFR 35.70(b) and (e), the licensee may conduct surveys for contamination and ambient exposure rates of the area where radiopharmaceutical waste is being stored whenever waste is moved, placed into, or removed from storage or quarterly; whichever is more frequent.
18. The licensee shall not use licensed material in field applications where activity is released except as provided otherwise by specific condition of this license.

**MATERIALS LICENSE  
SUPPLEMENTARY SHEET**

License Number

37-00783-04

Docket or Reference Number

030-02964

Amendment No. 25

19. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below, except for minor changes in the medical use radiation safety procedures as provided in 10 CFR 35.31. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.

- A. Application dated December 20, 1990
- B. Letter dated August 23, 1993
- C. Letter dated December 21, 1993
- D. Letter dated July 29, 1994
- E. Letter dated October 5, 1994
- F. Letter dated October 25, 1994
- G. Letter dated July 10, 1996

Date MAR 24 1997

For the U.S. Nuclear Regulatory Commission

**ORIGINAL SIGNED BY:**

**TARA L. WEIDNER**

By

Nuclear Materials Safety Branch  
Region I

King of Prussia, Pennsylvania 19406

MAR 24 1997

Karla S. McCaney  
Assistant Executive Director  
Wills Eye Hospital  
9th and Walnut Streets  
Philadelphia, PA 19107

Dear Ms. McCaney:

This refers to your license amendment request. Enclosed with this letter is the amended license. Please note that as part of this amendment, in accordance with 10 CFR 30.36, effective February 15, 1996, the expiration date of your license has been extended by a period of five years. Your new expiration date is stated in Item 4 of the license.

Please review the enclosed document carefully and be sure that you understand and fully implement all the conditions incorporated into the amended license. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region I Office, Licensing Assistance Team, (610) 337-5093 or 5239, so that we can provide appropriate corrections and answers.

Thank you for your cooperation.

Sincerely,

**ORIGINAL SIGNED BY:  
TARA L. WEIDNER**

Tara L. Weidner  
Division of Nuclear Materials Safety

License No. 37-00783-04  
Docket No. 030-02964  
Control No. 122935

Enclosure:  
Amendment No. 25

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DOCUMENT NAME: R:\WPS\MLTR\L3700783.04

To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	DNMS/RI	<input checked="" type="checkbox"/> N	DNMS/RI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NAME	Weidner <i>W</i>						
DATE	03/18/97	03/ /97	03/ /97	03/ /97	03/ /97	03/ /97	03/ /97

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 6, 1997

MS 20  
J-9

MEMORANDUM TO: Mohamed M. Shanbaky, Chief  
Nuclear Materials Safety Branch 1  
Division of Nuclear Materials Safety, RI

FROM: Donald A. Cool, Director  
Division of Industrial and  
Medical Nuclear Safety, NMSS 

SUBJECT: TECHNICAL ASSISTANCE REQUEST DATED JULY 17,  
1996, WILLS EYE HOSPITAL, LICENSE NUMBER 37-  
00783-4, REQUEST FOR EXEMPTION

I am responding to your technical assistance request (TAR) dated July 17, 1996 (attached), regarding a request from Wills Eye Hospital for exemption from 10 CFR 35.70 (b) and (e) for waste storage area survey requirements. The licensee is requesting that the weekly surveys required by 10 CFR 35.70 (b) and (e) be done on a quarterly basis, or whenever waste is added to or removed from the waste storage room. The request for exemption is based on ALARA considerations and the infrequent use of the waste storage area for the storage of radioactive waste.

The exemption from 10 CFR 35.70 (b) and (e) can be granted by the region provided the licensee meets the following requirements:

1. While radioactive waste is stored in the waste storage room, ambient exposure rate and contamination surveys must be conducted at least quarterly.
2. Ambient exposure rate and contamination surveys must be performed when adding radioactive waste to the waste storage room, and following the removal of any radioactive waste from the waste storage room.
3. While radioactive waste is being stored in the waste storage room, ambient exposure rate and contamination surveys must be performed, if the waste is moved within the room. 11  
DFX2
4. The current level of security of the waste storage room must be maintained.

CONTACT: William B. McCarthy, NMSS  
(301) 415-7894

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37-00783-04

122935

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During the periods of time when radioactive waste is not present in the room, there is no requirement for the waste storage room to be surveyed.

The following standard license condition should be used:

"Notwithstanding the requirements of 10 CFR 35.70 (b) and (e), the licensee may conduct surveys for contamination and ambient exposure rates of the area where radiopharmaceutical waste is being stored whenever waste is moved, placed into, or removed from storage or quarterly; whichever is more frequent."

Attachment: RI TAR dtd 7/17/96

DISTRIBUTION: Closes IMNS5466.WBM

NRC File Center IMNS Central File NMSSr/f IMABr/f

REGCHFS

PCVacca KRamsey, IMOB FCombs

Document Named: IMNS5466.WBM

\*SEE PREVIOUS CONCURRENCE

OFC	IMAB*	E	IMAB*	IMAB*	OGC*	IMNS
NAME	WBMCarthy	SLMerchant*	LWCamper	STreby		<i>[Signature]</i>
DATE	1/23/97	12/30/96	1/25/97	2/4/97		2/6/97

C = COVER

E = COVER & ENCLOSURE

N = NO COPY

## REGIONAL TECHNICAL ASSISTANCE REQUEST FORM

J MAB

Date: July 17, 1996Mail or E-Mail to: Donald A. Cool (DAC), Mail Stop: T8-F5  
Division of Industrial and Medical Nuclear Safety, NMSSIf E-mail, cc: CLEFrom: Mohamed M. Shanbaky, Region I  
Chief, Nuclear Materials Branch No. 17/17/96  
D. Cool for ShanbakyLicensee: Wills Eye HospitalLicense No.: 37-00783-04☐ Control No.: 122935☐ Letters dated: February 23, May 28, and July 10, 1996☐ Suggested change in licensing procedure (enclosed):

☐ Problem/Issue: Wills Eye Hospital is requesting an exemption from 10 CFR 35.70(b) and (e), which requires that they perform radiation level and contamination surveys of their waste storage room on a weekly basis. In support of the request, Wills Eye Hospital has provided information indicating that small quantities of radioactive materials have been used infrequently and their proposed frequency of survey is commensurate with the program scope and size (see attached letters dated February 23, May 28, and July 10, 1996). The licensee proposed two options for surveying the radioactive waste storage area, quarterly surveys or surveying when waste is added to/or removed from the storage area.

☐ Action Required: Review and determine if surveying the radioactive waste storage room on a quarterly basis or when waste is added to/or removed from the waste storage area is adequate to assure the public health and safety.

Recommended Action: Approve Wills Eye Hospital's request to survey the radioactive waste storage room on a quarterly basis or when waste is added to/or removed from the waste storage room.

Remarks:

~~9702120019 970206~~  
REG1 LIC30  
37-00783-04

Headquarter Reviewer:

Regional Reviewer: Tara L. WeidnerReviewer Code: J-9Reviewer Phone No.: (610) 337-5272 FAX No.: (610) 337-5269Request Needed by: As soon as possible

Attachment



February 23, 1996

Mr. Mohamed Shanbaky, Chief  
Materials Safety Branch 1  
Division of Nuclear Materials Safety  
U.S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406

RE: License No. 37-00783-04  
License No. 37-00783-05  
Docket No. 030-02964  
Docket No. 030-33972

*Amendment  
request applies to  
the -04 license.  
See request  
on page 3 of 14.*

## Reply to Notice of Violation

Dear Mr. Shanbaky:

This is in response to the notice of violation dated January 30, 1996 resulting from the inspections conducted December 16 and 18, 1995 and by telephone conversation on December 20, 1995 (Inspection Nos. 030-02964/95-001 and 030-33972/95-001). For each violation, the response includes: (1) the reason for the violation, (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid future violations; and (4) the date when full compliance will be achieved.

A. Contrary to (10 CFR 30.3) from November 7, 1994 to December 20, 1995, Wills Eye Hospital possessed approximately 2.5 millicuries of tritium without being authorized by a specific license and was not exempted from requiring a license.

1. This occurred as an oversight during license renewal. When considering the change from a broad scope license to a limited scope research, development, and medical license, the Radiation Safety Committee considered the radioactive materials in use at Wills Eye Hospital and radioactive material in storage; however, it failed to consider radioactive material in waste storage.

2. The unauthorized material was transferred to a waste disposal broker.

122935

FEB 26 1996

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3. Prior to any request to remove or change the type or quantity of radioactive material on the license, the Radiation Safety Committee will consider all materials on hand, including material in waste waiting for disposal.

4. Compliance was achieved February 13, 1996.

B. Contrary to (10 CFR 35.51 (a)(3) and (c), since 1991, the licensee did not have the apparent exposure rate from a dedicated check source as determined at the time of calibration noted on its Ludlum Model 3 or Berthold LB1210B survey instruments, and the licensee routinely failed to check each survey instrument for proper operation with a dedicated check source each day of use. The licensee uses these survey instruments to show compliance with 10CFR Part 35.

1. Although these survey instruments have been sent out to persons licensed to perform instrument calibrations, these licensees did not note the dose rates from the dedicated check source on the Berthold survey instrument. Further, activities conducted under 10 CFR Part 35 (medical uses) are infrequent, the last time was February, 1995. This contributed to recognizing the need for a dedicated check source and its use.

2. The Berthold survey instrument has a dedicated check source; however, the calibration service company failed to measure the dose rate from it at the time of calibration. We are actively seeking a vendor that will calibrate this instrument, and have identified two at the present time - RMC in Delaware, and Health Physics Associates in Lenhartsville, Pennsylvania. A check source will be ordered and affixed to the Ludlum survey instrument and future calibrations will include a measurement of the dedicated check source as required.

All future uses of these survey instruments (or other instruments) to show compliance with 10 CFR Part 35 will include a check of the proper operation of the instrument.

3. We will assure that the calibration service provider measure the output from a dedicated check source and record this datum on the calibration sticker on the instrument. Further, the individual performing the measurements is now aware of the requirements to use a dedicated check source to ensure the proper operation of the survey instrument.

4. We will send the Berthold survey instrument for calibration first. This should occur within the next 14 days. Following the return of the Berthold survey instrument, the Ludlum will be sent for calibration and to have a check source affixed. We anticipate compliance by March 21, 1996. In any event the likelihood of 10 CFR Part 35 activities between now and the date of full compliance is low.

C. Contrary to (10CFR 35.70 (b)), since 1991, the licensee did not survey with a radiation detection survey instrument, the cold room storage area on the 4th floor of Wills Eye Hospital. This is an area where radiopharmaceutical waste was stored.

1. Surveys in the cold room storage area have been performed since 1991, albeit not on a weekly basis. Records of these surveys are available for your review if required. This storage area is primarily used for research material and only occasionally used for radiopharmaceutical waste. It seems contrary to the ALARA principle for an individual to receive an exposure simply to take a measurement, when there has been no use of the facility since the last measurement. ~~Therefore, we request an exemption to the survey requirement of 10 CFR 35.70(b). We propose to survey the waste storage area at least quarterly, and upon placing radiopharmaceuticals in the waste storage area.~~ } 122935

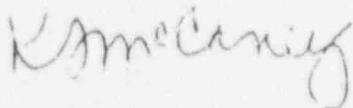
2. The Radiation Safety Officer conducts weekly surveys of the cold room. These surveys are documented.

3. A written procedure for surveying the waste storage area will be reviewed by the Radiation Safety Committee and incorporated into the Radiation Safety Manual.

4. We are now in full compliance.

If you have any questions regarding this response, please contact Theodore Sery, Ph.D., RSO at 215-928-3000, our Health Physics consultant, Kent Lambert, C.H.P., 215-762-8768, or you can contact me directly at 215-440-3153. Wills Eye Hospital is dedicated to maintaining a strong radiation safety program and the program can only benefit from your external review.

Sincerely,



Karla S. McCaney  
Assistant Executive Director

cc: Ted Sery, Ph.D., Radiation Safety Officer  
Kent Lambert, C.H.P.

122935

ms-1b  
J9

May 28, 1996

Tara Weidner  
U.S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406-1415License No. 37-00783-04  
Docket No. 030-02964  
Control No. 122935

Dear Ms. Weidner:

The following is offered in support of our request for an exemption from 10 CFR 35.70(b) which requires weekly surveys of the waste storage area.

1. We proposed to survey the waste storage area at the time quarterly laboratory surveys are performed. As an alternative, we propose to survey the waste storage area at the time that waste is placed into storage or removed from storage.

2. The actual radioactive usage is quite limited. The following table shows the usage of radioactive material since 1994:

Date Purchased	Isotope	Activity Received	Activity Used	Usage
1/11/94	<sup>32</sup> P	5 mCi	1 mCi	Medical
2/8/94	<sup>32</sup> P	5 mCi	1 mCi	Medical
10/11/94	<sup>32</sup> P	5 mCi	1 mCi	Medical
1/18/95	<sup>32</sup> P	5 mCi	1 mCi	Medical
6/21/95	<sup>35</sup> S	1 mCi	0.25 mCi	Non-Medical
12/21/95	<sup>35</sup> S	1 mCi	0.75 mCi	Non-Medical
4/1/96	<sup>35</sup> S	1 mCi	1 mCi	Non-Medical

Many facilities which actively manipulate similar quantities of radioactive material on a regular basis are only required to perform surveys monthly (see Regulatory Guide 10.5, Revision 3, Chapter 10.6.1).

3. The regulation is intended to assure that radiopharmaceutical waste storage areas which are entered frequently (i.e., multiple times per day), have radioactive waste added

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License No. 37-00783-04

Docket No. 030-02964

Control No. 122935

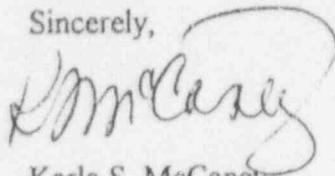
May 28, 1996

Page 2

frequently, and have waste removed regularly as in a standard nuclear medicine facility are not contaminated. These conditions do not exist at our radioactive waste storage area. The radioactive waste generated from our medical application is much more consistent with radioactive waste from research laboratories than from nuclear medicine facilities.

If you have any questions or if you need any additional information, please feel free to contact me or you may contact our consultant, Kent Lambert, CHP at 215-762-8768. Thank you for your consideration of this matter.

Sincerely,



Karla S. McCaney  
Assistant Executive Director

KSM/sml

122935



July 10, 1996

Tara Weidner, Health Physicist  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

*MS 16  
J-9*

Re: License No: 37-00783-04  
Docket No: 030-02964  
Control No: 122935

Dear Ms. Weidner:

In response to your telephone conversation with Kent Lambert several weeks ago, I am providing the following additional information as requested:

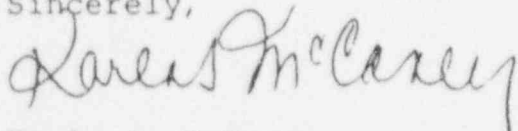
1. We are seeking exemption to 10 CFR 35.70(b) and (e) for the radioactive waste decay in storage room to the extent that the survey is performed quarterly rather than weekly.

2. The room is locked and the distribution of the key is limited to Dr. Sery, RSO; Dr. Donoso, Authorized User; and the Security Department.

3. The type and quantity of radioactive material in waste for decay in storage is such that radiation levels will not exceed 2 millirem in an hour in an unrestricted area. Further, the radiation levels are such that no individual member of the public will exceed 100 millirem in a year. The isotopes in use are beta emitters and low energy photo emitters. The radiation from this waste is significantly shielded by the steel drum container.

If you have any further questions please do not hesitate to contact me or you may contact our consultant, Kent Lambert at (215) 762-8768.

Sincerely,



Karla S. McCaney  
Assistant Executive Director

KSM/sml

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37-00783-04

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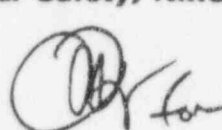
REGIONAL TECHNICAL ASSISTANCE REQUEST FORM

Date: July 17, 1996

Mail or E-Mail to: Donald A. Cool (DAC), Mail Stop: T8-F5  
Division of Industrial and Medical Nuclear Safety, NMSS

If E-mail, cc: CLE

From: Mohamed M. Shanbaky, Region I  
Chief, Nuclear Materials Branch No. 1

 7/17/96  
for Shanbaky

Licensee: Wills Eye Hospital

License No.: 37-00783-04

☐ Control No.: 122935

☐ Letters dated: February 23, May 28, and July 10, 1996

☐ Suggested change in licensing procedure (enclosed):

☐ Problem/Issue: Wills Eye Hospital is requesting an exemption from 10 CFR 35.77(b) and (e), which requires that they perform radiation level and contamination surveys of their waste storage room on a weekly basis. In support of the request, Wills Eye Hospital has provided information indicating that small quantities of radioactive materials have been used infrequently and their proposed frequency of survey is commensurate with the program scope and size (see attached letters dated February 23, May 28, and July 10, 1996). The licensee proposed two options for surveying the radioactive waste storage area, quarterly surveys or surveying when waste is added to/or removed from the storage area.

☐ Action Required: Review and determine if surveying the radioactive waste storage room on a quarterly basis or when waste is added to/or removed from the waste storage area is adequate to assure the public health and safety.

Recommended Action: Approve Wills Eye Hospital's request to survey the radioactive waste storage room on a quarterly basis or when waste is added to/or removed from the waste storage room.

Remarks:

Headquarter Reviewer:

Regional Reviewer: Tara L. Weidner

Reviewer Code: J-9

Reviewer Phone No.: (610) 337-5272

Request Needed by: As soon as possible

FAX No.: (610) 337-5269

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ML 10

February 23, 1996

Mr. Mohamed Shanbaky, Chief  
Materials Safety Branch 1  
Division of Nuclear Materials Safety  
U.S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406

RE: License No. 37-00783-04  
License No. 37-00783-05  
Docket No. 030-02964  
Docket No. 030-33972

*Amendment  
request applies to  
the -04 license.  
See request  
on page 3 of 112.*

## Reply to Notice of Violation

Dear Mr. Shanbaky:

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2. The unauthorized material was transferred to a waste disposal broker.

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FEB 26 1996

3. Prior to any request to remove or change the type or quantity of radioactive material on the license, the Radiation Safety Committee will consider all materials on hand, including material in waste waiting for disposal.

4. Compliance was achieved February 13, 1996.

B. Contrary to (10 CFR 35.51 (a)(3) and (c), since 1991, the licensee did not have the apparent exposure rate from a dedicated check source as determined at the time of calibration noted on its Ludlum Model 3 or Berthold LB1210B survey instruments, and the licensee routinely failed to check each survey instrument for proper operation with a dedicated check source each day of use. The licensee uses these survey instruments to show compliance with 10CFR Part 35.

1. Although these survey instruments have been sent out to persons licensed to perform instrument calibrations, these licensees did not note the dose rates from the dedicated check source on the Berthold survey instrument. Further, activities conducted under 10 CFR Part 35 (medical uses) are infrequent, the last time was February, 1995. This contributed to recognizing the need for a dedicated check source and its use.

2. The Berthold survey instrument has a dedicated check source; however, the calibration service company failed to measure the dose rate from it at the time of calibration. We are actively seeking a vendor that will calibrate this instrument, and have identified two at the present time - RMC in Delaware, and Health Physics Associates in Lenhartsville, Pennsylvania. A check source will be ordered and affixed to the Ludlum survey instrument and future calibrations will include a measurement of the dedicated check source as required.

All future uses of these survey instruments (or other instruments) to show compliance with 10 CFR Part 35 will include a check of the proper operation of the instrument.

3. We will assure that the calibration service provider measure the output from a dedicated check source and record this datum on the calibration sticker on the instrument. Further, the individual performing the measurements is now aware of the requirements to use a dedicated check source to ensure the proper operation of the survey instrument.

4. We will send the Berthold survey instrument for calibration first. This should occur within the next 14 days. Following the return of the Berthold survey instrument, the Ludlum will be sent for calibration and to have a check source affixed. We anticipate compliance by March 21, 1996. In any event the likelihood of 10 CFR Part 35 activities between now and the date of full compliance is low.

C. Contrary to (10CFR 35.70 (b)), since 1991, the licensee did not survey with a radiation detection survey instrument, the cold room storage area on the 4th floor of Wills Eye Hospital. This is an area where radiopharmaceutical waste was stored.

1. Surveys in the cold room storage area have been performed since 1991, albeit not on a weekly basis. Records of these surveys are available for your review if required. This storage area is primarily used for research material and only occasionally used for radiopharmaceutical waste. It seems contrary to the ALARA principle for an individual to receive an exposure simply to take a measurement, when there has been no use of the facility since the last measurement. ~~Therefore, we request an exemption to the survey requirement of 10 CFR 35.70(b). We propose to survey this waste storage area at least quarterly, and upon placing radiopharmaceuticals in the waste storage area.~~ } 122935

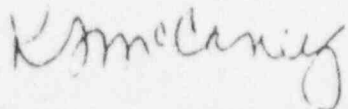
2. The Radiation Safety Officer conducts weekly surveys of the cold room. These surveys are documented.

3. A written procedure for surveying the waste storage area will be reviewed by the Radiation Safety Committee and incorporated into the Radiation Safety Manual.

4. We are now in full compliance.

If you have any questions regarding this response, please contact Theodore Sery, Ph.D., RSO at 215-928-3000, our Health Physics consultant, Kent Lambert, C.H.P., 215-762-8768, or you can contact me directly at 215-440-3153. Wills Eye Hospital is dedicated to maintaining a strong radiation safety program and the program can only benefit from your external review.

Sincerely,



Karla S. McCaney  
Assistant Executive Director

cc: Ted Sery, Ph.D., Radiation Safety Officer  
Kent Lambert, C.H.P.

122935

SECTION COPY



ms-1b  
J9

May 28, 1996

Tara Weidner  
U.S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406-1415

License No. 37-00783-04  
Docket No. 030-02964  
Control No. 122935

Dear Ms. Weidner:

The following is offered in support of our request for an exemption from 10 CFR 35.70(b) which requires weekly surveys of the waste storage area.

1. We proposed to survey the waste storage area at the time quarterly laboratory surveys are performed. As an alternative, we propose to survey the waste storage area at the time that waste is placed into storage or removed from storage.

2. The actual radioactive usage is quite limited. The following table shows the usage of radioactive material since 1994:

Date Purchased	Isotope	Activity Received	Activity Used	Usage
1/11/94	<sup>32</sup> P	5 mCi	1 mCi	Medical
2/8/94	<sup>32</sup> P	5 mCi	1 mCi	Medical
10/11/94	<sup>32</sup> P	5 mCi	1 mCi	Medical
1/18/95	<sup>32</sup> P	5 mCi	1 mCi	Medical
6/21/95	<sup>35</sup> S	1 mCi	0.25 mCi	Non-Medical
12/21/95	<sup>35</sup> S	1 mCi	0.75 mCi	Non-Medical
4/1/96	<sup>35</sup> S	1 mCi	1 mCi	Non-Medical

Many facilities which actively manipulate similar quantities of radioactive material on a regular basis are only required to perform surveys monthly (see Regulatory Guide 10.5, Revision 3, Chapter 10.6.1).

3. The regulation is intended to assure that radiopharmaceutical waste storage areas which are entered frequently (i.e., multiple times per day), have radioactive waste added

License No. 37-00783-04

Docket No. 030-02964

Control No. 122935

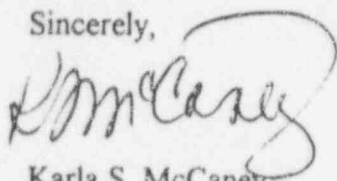
May 28, 1996

Page 2

frequently, and have waste removed regularly as in a standard nuclear medicine facility are not contaminated. These conditions do not exist at our radioactive waste storage area. The radioactive waste generated from our medical application is much more consistent with radioactive waste from research laboratories than from nuclear medicine facilities.

If you have any questions or if you need any additional information, please feel free to contact me or you may contact our consultant, Kent Lambert, CHP at 215-762-8768. Thank you for your consideration of this matter.

Sincerely,



Karla S. McCaney  
Assistant Executive Director

KSM/sml

122935

July 10, 1996

Tara Weidner, Health Physicist  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

*MS16  
J-9*

Re: License No: 37-00783-04  
Docket No: 030-02964  
Control No: 122935

Dear Ms. Weidner:

In response to your telephone conversation with Kent Lambert several weeks ago, I am providing the following additional information as requested:

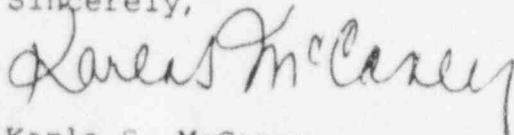
1. We are seeking exemption to 10 CFR 35.70(b) and (e) for the radioactive waste decay in storage room to the extent that the survey is performed quarterly rather than weekly.

2. The room is locked and the distribution of the key is limited to Dr. Sery, RSO; Dr. Donoso, Authorized User; and the Security Department.

3. The type and quantity of radioactive material in waste for decay in storage is such that radiation levels will not exceed 2 millirem in an hour in an unrestricted area. Further, the radiation levels are such that no individual member of the public will exceed 100 millirem in a year. The isotopes in use are beta emitters and low energy photo emitters. The radiation from this waste is significantly shielded by the steel drum container.

If you have any further questions please do not hesitate to contact me or you may contact our consultant, Kent Lambert at (215) 762-8768.

Sincerely,



Karla S. McCaney  
Assistant Executive Director

KSM/sml

OFFICIAL RECORD COPY

ML 10

122935

JUL 16 1996

July 10, 1996

Tara Weidner, Health Physicist  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

MS 16

J-9

Re: License No: 37-00783-04  
Docket No: 030-02964  
Control No: 122935

Dear Ms. Weidner:

In response to your telephone conversation with Kent Lambert several weeks ago, I am providing the following additional information as requested:

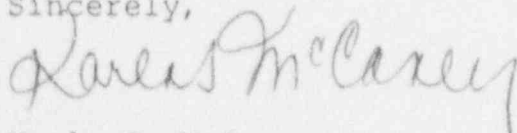
1. We are seeking exemption to 10 CFR 35.70(b) and (e) for the radioactive waste decay in storage room to the extent that the survey is performed quarterly rather than weekly.

2. The room is locked and the distribution of the key is limited to Dr. Sery, RSO; Dr. Donoso, Authorized User; and the Security Department.

3. The type and quantity of radioactive material in waste for decay in storage is such that radiation levels will not exceed 2 millirem in an hour in an unrestricted area. Further, the radiation levels are such that no individual member of the public will exceed 100 millirem in a year. The isotopes in use are beta emitters and low energy photo emitters. The radiation from this waste is significantly shielded by the steel drum container.

If you have any further questions please do not hesitate to contact me or you may contact our consultant, Kent Lambert at (215) 762-8768.

Sincerely,



Karla S. McCaney  
Assistant Executive Director

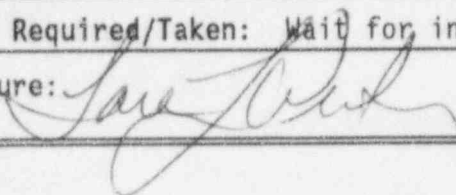
KSM/sml

OFFICIAL RECORD COPY

ML 10

122935

JUL 16 1996

TELEPHONE CONVERSATION RECORD	Date: 6-4-96	Time: 3:30
Mail Control No.: 122935	License No.: 37-00783-04	Docket No.: 030-02964
Person Called: Kent Lambert	Licensee: Wills Eye Hospital	Telephone Number: 215-762-8768
Person Calling: Tara Weidner 337-5272		
Subject: License amendment		
Summary: Additional information for TAR is needed: (1) Request exemption from 10 CFR 35.70(b) and (e); (2) Address issue of access and control of the area; and (3) Confirm that doses to the public are well below 10 CFR 20.1301.		
Action Required/Taken: Wait for info		
Signature: 	Date: 6-4-96	

OFFICIAL RECORD COPY

ML 10



ms-1b  
J9

May 28, 1996

Tara Weidner  
U.S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406-1415

License No. 37-00783-04  
Docket No. 030-02964  
Control No. 122935

Dear Ms. Weidner:

The following is offered in support of our request for an exemption from 10 CFR 35.70(b) which requires weekly surveys of the waste storage area.

1. We proposed to survey the waste storage area at the time quarterly laboratory surveys are performed. As an alternative, we propose to survey the waste storage area at the time that waste is placed into storage or removed from storage.
2. The actual radioactive usage is quite limited. The following table shows the usage of radioactive material since 1994:

Date Purchased	Isotope	Activity Received	Activity Used	Usage
1/11/94	<sup>32</sup> P	5 mCi	1 mCi	Medical
2/8/94	<sup>32</sup> P	5 mCi	1 mCi	Medical
10/11/94	<sup>32</sup> P	5 mCi	1 mCi	Medical
1/18/95	<sup>32</sup> P	5 mCi	1 mCi	Medical
6/21/95	<sup>35</sup> S	1 mCi	0.25 mCi	Non-Medical
12/21/95	<sup>35</sup> S	1 mCi	0.75 mCi	Non-Medical
4/1/96	<sup>35</sup> S	1 mCi	1 mCi	Non-Medical

Many facilities which actively manipulate similar quantities of radioactive material on a regular basis are only required to perform surveys monthly (see Regulatory Guide 10.5, Revision 3, Chapter 10.6.1).

3. The regulation is intended to assure that radiopharmaceutical waste storage areas which are entered frequently (i.e., multiple times per day), have radioactive waste added

License No. 37-00783-04

Docket No. 030-02964

Control No. 122935

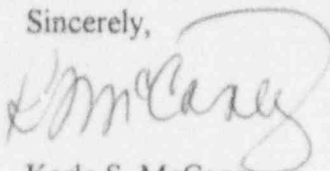
May 28, 1996

Page 2

frequently, and have waste removed regularly as in a standard nuclear medicine facility are not contaminated. These conditions do not exist at our radioactive waste storage area. The radioactive waste generated from our medical application is much more consistent with radioactive waste from research laboratories than from nuclear medicine facilities.

If you have any questions or if you need any additional information, please feel free to contact me or you may contact our consultant, Kent Lambert, CHP at 215-762-8768. Thank you for your consideration of this matter.

Sincerely,



Karla S. McCaney  
Assistant Executive Director

KSM/sml

122935

MAY 10 1996

License No. 37-00783-04  
Docket No. 030-02964  
Control No. 122935

Ms. Karla S. McCaney  
Assistant Executive Director  
Wills Eye Hospital  
900 Walnut Street  
Philadelphia, PA 19107-3000

Dear Ms. McCaney:

This is in reference to your letter dated February 23, 1996 and telephone conversations between Kent Lambert, Consultant and myself on March 18, 1996 and May 8, 1996 to amend License No. 37-00783-04. In order to continue our review, we need the following additional information:

1. Provide a detailed justification as to why this exemption from 10 CFR 35.70(b) is being sought. Specifically, 10 CFR 35.70(b) states, in part, that a licensee shall survey with a radiation detection instrument at least once each week all areas where radiopharmaceutical waste is stored. In your request you propose to survey the waste storage area at least quarterly, and upon placing radiopharmaceuticals in the waste storage area. In your justification provide:
  - (a) a description of the size and scope of your licensed activities;
  - (b) the quantity of licensed material (medical waste vs. research waste) that is stored in the waste storage area;
  - (c) the frequency that waste is placed in the storage area;
  - (d) your proposed schedule of waste storage area surveys; and
  - (e) any other information you feel may assist us in the review of your request.

OFFICIAL RECORD COPY

**ML 10**

K.S. McCaney  
Wills Eye Hospital

-2-

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. 122935. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5272.

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**  
**Tara Weidner**

Tara L. Weidner  
Division of Nuclear Materials Safety

License No. 37-00783-04  
Docket No. 030-02964  
Control No. 122935

cc: Ted Sery, Ph.D.  
Radiation Safety Officer

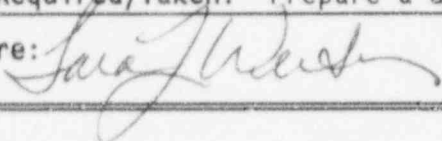
Kent Lambert  
Radiation Safety Officer  
Medical College of Pennsylvania and  
Hahnemann University/Center City Campus  
Radiation Safety Office, MS 102  
Broad and Vine Streets  
Philadelphia, PA 19102-1192

DOCUMENT NAME: R:\WPS\DLTR\D3700783.04

To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	DNMS/RI	N	DNMS/RI				
NAME	TWeidner/tlw						
DATE	05/08/96	05/	/96	05/	/96	05/	/96


OFFICIAL RECORD COPY

<b>TELEPHONE CONVERSATION RECORD</b>		<b>Date:</b> 5-8-96	<b>Time:</b> 10:00
<b>Mail Control No.:</b> 122935		<b>License No.:</b> 37-00783-04	<b>Docket No.:</b> 030-02964
<b>Person Called:</b> Kent Lambert, Consultant		<b>Licensee:</b> Wills Eye Hospital	<b>Telephone Number:</b> 215-762-8768
<b>Person Calling:</b> Tara Weidner 337-5272			
<b>Subject:</b> License amendment			
<b>Summary:</b> I called Kent because he had not responded to my telephone deficiency on March 18, 1996. He will respond by justifying the request for the exemption from the regs in 10 CFR 35.70(b). I prepared a deficiency letter so that if he does not respond within 30 days we will send a threat to abandon letter.			
<b>Action Required/Taken:</b> Prepare a deficiency letter			
<b>Signature:</b> 		<b>Date:</b> 5-8-96	

OFFICIAL RECORD COPY

ML 10



TELEPHONE CONVERSATION RECORD	Date: 3-18-96	Time: 9:30
Mail Control No.: 122935	License No.: 37-00783-04	Docket No.: 030-02964
Person Called: Kent Lambert	Licensee: Wills Eye Hospital	Telephone Number: 215-762-8768
Person Calling: Tara Weidner 337-5272		
Subject: License amendment		
Summary: Kent will send more information to justify the exemption to 10 CFR 35.70.		
Action Required/Taken: Wait for the info		
Signature: 	Date: 3-18-96	

OFFICIAL RECORD COPY

**ML 10**

February 23, 1996

Mr. Mohamed Shantaky, Chief  
Materials Safety Branch 1  
Division of Nuclear Materials Safety  
U.S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406

*NOTE  
SEE PAGE 3  
OF THIS LETTER.*

RE: License No. 37-00783-04  
License No. 37-00783-05  
Docket No. 030-02964  
Docket No. 030-33972

Reply to Notice of Violation

Dear Mr. Shantaky:

This is in response to the notice of violation dated January 30, 1996 resulting from the inspections conducted December 16 and 18, 1995 and by telephone conversation on December 20, 1995 (Inspection Nos. 030-02964/95-001 and 030-33972/95-001). For each violation, the response includes: (1) the reason for the violation, (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid future violations; and (4) the date when full compliance will be achieved.

A. Contrary to (10 CFR 30.3) from November 7, 1994 to December 20, 1995, Wills Eye Hospital possessed approximately 2.5 millicuries of tritium without being authorized by a specific license and was not exempted from requiring a license.

1. This occurred as an oversight during license renewal. When considering the change from a broad scope license to a limited scope research, development, and medical license, the Radiation Safety Committee considered the radioactive materials in use at Wills Eye Hospital and radioactive material in storage; however, it failed to consider radioactive material in waste storage.

2. The unauthorized material was transferred to a waste disposal broker.

3. Prior to any request to remove or change the type or quantity of radioactive material on the license, the Radiation Safety Committee will consider all materials on hand, including material in waste waiting for disposal.

4. Compliance was achieved February 13, 1996.

B. Contrary to (10 CFR 35.51 (a)(3) and (c), since 1991, the licensee did not have the apparent exposure rate from a dedicated check source as determined at the time of calibration noted on its Ludlum Model 3 or Berthold LB1210B survey instruments, and the licensee routinely failed to check each survey instrument for proper operation with a dedicated check source each day of use. The licensee uses these survey instruments to show compliance with 10CFR Part 35.

1. Although these survey instruments have been sent out to persons licensed to perform instrument calibrations, these licensees did not note the dose rates from the dedicated check source on the Berthold survey instrument. Further, activities conducted under 10 CFR Part 35 (medical uses) are infrequent, the last time was February, 1995. This contributed to recognizing the need for a dedicated check source and its use.

2. The Berthold survey instrument has a dedicated check source; however, the calibration service company failed to measure the dose rate from it at the time of calibration. We are actively seeking a vendor that will calibrate this instrument, and have identified two at the present time - RMC in Delaware, and Health Physics Associates in Lenhartsville, Pennsylvania. A check source will be ordered and affixed to the Ludlum survey instrument and future calibrations will include a measurement of the dedicated check source as required.

All future uses of these survey instruments (or other instruments) to show compliance with 10 CFR Part 35 will include a check of the proper operation of the instrument.

3. We will assure that the calibration service provider measure the output from a dedicated check source and record this datum on the calibration sticker on the instrument. Further, the individual performing the measurements is now aware of the requirements to use a dedicated check source to ensure the proper operation of the survey instrument.

4. We will send the Berthold survey instrument for calibration first. This should occur within the next 14 days. Following the return of the Berthold survey instrument, the Ludlum will be sent for calibration and to have a check source affixed. We anticipate compliance by March 21, 1996. In any event the likelihood of 10 CFR Part 35 activities between now and the date of full compliance is low.

C. Contrary to (10CFR 35.70 (b)), since 1991, the licensee did not survey with a radiation detection survey instrument, the cold room storage area on the 4th floor of Wills Eye Hospital. This is an area where radiopharmaceutical waste was stored.

1. Surveys in the cold room storage area have been performed since 1991, albeit not on a weekly basis. Records of these surveys are available for your review if required. This storage area is primarily used for research material and only occasionally used for radiopharmaceutical waste. It seems contrary to the ALARA principle for an individual to receive an exposure simply to take a measurement, when there has been no use of the facility since the last measurement. Therefore, we request an exemption to the survey requirement of 10 CFR 35.70(b). We propose to survey the waste storage area at least quarterly, and upon placing radiopharmaceuticals in the waste storage area. } 122935

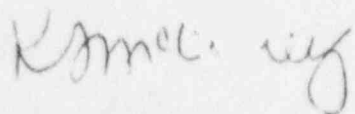
2. The Radiation Safety Officer conducts weekly surveys of the cold room. These surveys are documented.

3. A written procedure for surveying the waste storage area will be reviewed by the Radiation Safety Committee and incorporated into the Radiation Safety Manual.

4. We are now in full compliance.

If you have any questions regarding this response, please contact Theodore Sery, Ph.D., RSO at 215-928-3000, our Health Physics consultant, Kent Lambert, C.H.P., 215-762-8768, or you can contact me directly at 215-440-3153. Wills Eye Hospital is dedicated to maintaining a strong radiation safety program and the program can only benefit from your external review.

Sincerely,



Karla S. McCaney  
Assistant Executive Director

cc: Ted Sery, Ph.D., Radiation Safety Officer  
Kent Lambert, C.H.P.



March 21, 1997

Ms. Brenda Brown  
U.S. Nuclear Regulatory Commission  
Mail Stop T-9E10  
11545 Rockville Pike  
Rockville, MD 20852-2738

RE: LICENSE NO. 37-00783-04  
Our Letter dated 2/23/96  
Cont. No. 122935

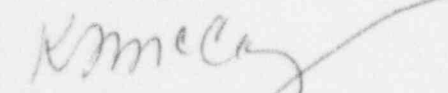
Dear Ms. Brown:

Enclosed please find our check No. 305206 in the amount of \$430.00 and a copy of our letter to Mr. Shanbaky of the NRC dated February 23, 1996.

We apologize for the delay in sending this payment due to the misunderstanding of the amendment to our license brought about by our letter of February 23, 1996.

Should you have any questions, please feel free to contact my office.

Sincerely,

  
Karla S. McCaney  
Assistant Executive Director

KSM/sml  
Attachments

## LICENSE FEE REQUIREMENTS

LICENSE FEE AND DEBT COLLECTION BRANCH  
DIVISION OF ACCOUNTING AND FINANCE  
OFFICE OF THE CONTROLLER  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, DC 20555-0001WILLS EYE HOSPITAL  
ATTN: KARLA S. MCCANEY  
ASSISTANT EXECUTIVE DIRECTOR  
900 WALNUT STREET  
PHILADELPHIA, PA 19107-5598

## TYPE OF ACTION

- ☐
- NEW LICENSE
- 
- ☐
- RENEWAL OF LICENSE
- 
- ☒
- AMENDMENT TO LICENSE

REQUESTED DATE

2-23-96

LICENSE NUMBER

37-00783-04

CONTROL NUMBER

122935

## I. APPLICATION FEE DUE

Your request for a licensing action is subject to the fee(s) in the category(ies) noted below in accordance with Section 170.31 of the enclosed Federal Register notice. Payment of the fee is required prior to the issuance of the license, renewal, or amendment.

FEE CATEGORY	APPLICATION	RENEWAL	AMENDMENT
7C	\$	\$	\$ 430.00
	\$	\$	\$
	\$	\$	\$
	\$	\$	\$
	\$	\$	\$
	\$	\$	\$
	\$	\$	\$
	\$	\$	\$
	\$	\$	\$

FEE(s) DUE	\$	430.00
PAYMENT RECEIVED	\$	0.00
AMOUNT DUE	\$	430.00

☒ Your request was received without the prescribed application fee.☐ We received your Check No. \_\_\_\_\_ in the amount of \$ \_\_\_\_\_. Payment of the additional fee noted above is required.☐ Your request will increase the scope of your license program. Therefore, your request is subject to the application fee(s) noted above. Refer to Section 170.31 and Footnote 1(d)(2).☐ Your license expired prior to the receipt of your application for renewal. Therefore, your request is subject to the application fee(s) noted above. Refer to Section 170.31 and Footnote 1(a).

MAKE PAYMENT OF THE FEE(S) TO THE U.S. NUCLEAR REGULATORY COMMISSION AND MAIL THE PAYMENT TO THE ADDRESS LISTED AT THE TOP OF THIS FORM. IF WE DO NOT RECEIVE A REPLY FROM YOU WITHIN 30 CALENDAR DAYS FROM THE DATE LISTED BELOW, WE SHALL ASSUME THAT YOU DO NOT WISH TO PURSUE YOUR APPLICATION AND WILL VOID THIS ACTION.

## II. FEE NOT REQUIRED

☐ Enclosed is Check No. \_\_\_\_\_ which accompanied your request. The fee is not required because:☐ We received your Check No. \_\_\_\_\_ in payment of the fee.☐ The Licensing staff has informed us that your request is to be considered as a continuation of your request dated \_\_\_\_\_.☐ \_\_\_\_\_, Control No. \_\_\_\_\_.☐ Your request was combined, prior to review, with your request, Control No. \_\_\_\_\_.

## III. CHECK RETURNED

☐ Enclosed is Check No. \_\_\_\_\_ which was returned to us by the bank for:☐ INSUFFICIENT FUNDS☐ ACCOUNT CLOSED☐ OTHER \_\_\_\_\_

MAIL THE REPLACEMENT CHECK TO THE ADDRESS LISTED AT THE TOP OF THIS FORM AND REFERENCE THE ABOVE CONTROL NUMBER.

## IV. LICENSE ISSUED WITHOUT THE REQUIRED FEE

☐ License No. \_\_\_\_\_ Amendment No. \_\_\_\_\_, issued on \_\_\_\_\_.

\_\_\_\_\_ was issued without the required fee being collected. The fee required is noted in Section I of this form.

☐ The scope of your licensed program was increased. Therefore, your request is subject to the application fee(s) noted in Section I of this form. Refer to Section 170.31 and Footnote 1(d)(2).☐ Because of the urgency of your request, the license was issued without remittance of the prescribed fee noted in Section I of this form.

SIGNATURE -- LICENSE FEE ANALYST

LFDCB

LF CB

Distribution:

MAF Correspondence FY

LFDCB Chief

LFDCB Analyst

Invoice File w/encl

LFDCB R/F (2)

DAF R/F

DATE

BRENDA BROWN

3/14/96

3-14-96



BETWEEN:

LICENSE FEE MANAGEMENT BRANCH, ARM  
AND  
REGIONAL LICENSING SECTIONS

(FOR LFMS USE)  
INFORMATION FROM LTS

PROGRAM CODE: 02120  
STATUS CODE: 0  
FEE CATEGORY: 7C  
EXP. DATE: 19991130  
FEE COMMENTS: 5/29/80 MEMO  
DECOM FIN ASSUR REQD: N

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED  
APPLICANT/LICENSEE: WILLS EYE HOSPITAL  
RECEIVED DATE: 960226  
DOCKET NO: 3002964  
CONTROL NO.: 122935  
LICENSE NO.: 37-00783-04  
ACTION TYPE: AMENDMENT

2. FEE ATTACHED

AMOUNT:  
CHECK

3. COMMENT

SIGNED  
DATE

*M. A. Perkins*  
3/8/96

B. LICENSE FEE MANAGEMENT BRANCH (CHECK WHEN MILESTONE 03 IS ENTERED) ☒

1. FEE CATEGORY AND AMOUNT: 7C 8430

2. CORRECT FEE PAID. APPLICATION MAY BE PROCESSED FOR:

AMENDMENT  
RENEWAL  
LICENSE

3. OTHER

SIGNED  
DATE

Log MAK6  
Pamper  
Check No. 305206  
Amount 8430  
Fee Category 7C  
Type of Fee AMB  
Check Rec'd 4/1/97  
Completed BB

07 For 3/24/97

3/19/97  
I called K. McCann, she was  
confused, she thought since this  
was a response to a violation report,  
no fee was due. I explained the  
license had to be amended,  
fee is due. She apologized, and  
she'd pay the fee today.

BBrown