NMLS:RSH
Control No. 419607

St. Peter's Community Hospital
ATTN: Mr. John Guy
Administrator
2475 Broadway
Helena, Montana 59601

JUN 29 1987

Gentlemen:

This refers to your application dated April 3, 1987, requesting renewal of your byproduct materials license. We have completed our review of your application and have the following comments and need for additional information:

1. Your Radiation Safety Committee is not formulated in accordance with 10 CFR 35.22. Confirm that membership of the radiation safety committee will include at least the following: an authorized user for each type of use permitted by the license, a representative of the nursing staff, a representative of the institutions management, and the Radiation Safety Officer. See Appendix F of the enclosed Regulatory Guide 10.8, Revision 2.

2. Columbus Hospital, the organization that you wish to use for survey meter calibration, does not have a license with the NRC for operation of a commercial instrument calibration service. If you intend to contract this service, you should specify a licensed or authorized vendor.

3. With regard to personnel monitoring devices, please specify:

   a. Name of the supplier.

   b. Type of devices used (e.g., film or TLD; body, wrist, or ring).

   c. Frequency of changing monitoring devices.

   Appendix D of Regulatory Guide 10.8, Revision 2, describes the personnel monitoring program.

4. Radiation workers other than authorized used physicians must receive instruction as specified in 10 CFR 19.12. You must not assume that this instruction has been adequately covered by prior occupational training such as board certification. In addition, any ancillary personnel (clerical, nursing, housekeeping, security, etc.) whose duties may require them to work in the vicinity of radioactive material need to be informed about radiation hazards and appropriate precautions. Outline your method to assure that these employees receive the necessary instruction initially when they are hired and annually thereafter on a refresher basis. (See Appendix A of Regulatory Guide 10.8, Revision 2.)

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5. Submit a copy of your ALARA program. You may choose to adopt the model ALARA program outlined in Appendix J, Regulatory Guide 10.8, Revision 2.

6. Submit a copy of your leak-test procedures for sealed sources. If you choose to adopt the model procedure outlined in Appendix H, Regulatory Guide 10.8, Revision 2, you may state this in your application.

7. Submit a copy of your spill procedures. If you choose to adopt the model spill procedures outlined in Appendix J, Regulatory Guide 10.8, Revision 2, you may state this in your application.

8. Submit additional information regarding your procedures for ordering and receiving radioactive material. If you choose to adopt the model guidance for ordering and receiving radioactive material outlined in Appendix K, Regulatory Guide 10.8, Revision 2, you may state this in your application.

9. Submit a copy of your procedures for opening packages. If you choose to adopt the model procedures outlined in Appendix L, Regulatory Guide 10.8, Revision 2, you may state this in your application.

10. Submit a copy of your procedures outlining your record system for unit dose use and multidose vial use as required by 10 CFR 30.51 and 35.53. If you choose to adopt model procedures outlined in Appendices M.1 and M.2, Regulatory Guide 10.8, Revision 2, you may state this in your application.

11. Submit a copy of your procedures for measuring and recording molybdenum concentrations in accordance with 10 CFR 35.205. If you choose to adopt model procedures outlined in Appendix M.3, Regulatory Guide 10.8, Revision 2, you may state this in your application.

12. Describe your routine area survey program, including the type and frequency of surveys, the areas to be surveyed, the levels of contamination that you consider to be acceptable, and provisions for preserving records of surveys. Appendix N, Regulatory Guide 10.8, Revision 2, describes the survey criteria that we find acceptable.

13. If you intend to use aerosols or noble gases you must submit procedures for monitoring, calculating, and controlling air concentrations. If you do not intend to use these materials you should so indicate. You may adopt reference Appendix O, Regulatory Guide 10.8, Revision 2, as your procedure.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Please reply in duplicate and refer to Control No. 419607.

Sincerely,

Original Signed By
L. L. Cain

Ralph S. Heyer
Nuclear Materials Licensing Section

Enclosure: Regulatory Guide 10.8,
Revision 2 (August 1985)

bcc w/o enclosure:
RLBangart