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JUL 23 1987

Ralston Purina Company  
ATTN: Kathryn S. Phillips  
Radiation Safety Officer  
Checkerboard Square  
St. Louis, MO 63164

Dear Ms. Phillips:

This is in reference to your letter dated June 10, 1987, and our telephone conversation of July 15, 1987, requesting an amendment to your NRC License Number 24-08334-02. As discussed in our telephone conversation, we will need you to submit the following additional information concerning your procedures for your research program:

1. Regarding the addition of Judy O'Brien as a user for phosphorous-32 for in-vitro diagnostic assays, the information submitted on Ms. O'Brien's experience with radioactive material shows that between July and December of 1979, she received experience with only tritium. Based on this information, we will need you to submit a more current description of Ms. O'Brien's actual training and work experience with radioactive materials, in particular phosphorous-32. This description should include the specific isotopes, maximum quantities of material handles, where the experience was gained, the duration of experience, and the type of use.
2. In reference to Item Number 14 under Laboratory Rules, which describes your area survey procedures, we will need you to submit a more detailed description of the frequency at which surveys will be performed (e.g., daily, weekly, monthly). We recommend that areas where microcurie amounts are used be surveyed monthly, all other areas should be surveyed at least weekly or daily depending upon the nature of the radioactive material and their use.

In addition, please submit the action levels used for decontamination. (We recommend an action level of at least 200 dpm/100 cm<sup>2</sup>).

3. a. In regards to your procedures for receiving and opening packages, please modify your procedures to include:
  - (1) Notifying responsible person (e.g., radiation safety officer) and stopping procedure if exposure rates found on the external surface of the package are in excess of 200 millirem per hour or at three feet from the external surface of the package in excess of 10 millirem per hour.

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- (2) All packages will be checked to verify that contents agree with those on the packing slip and that the shipment does not exceed the possession limit.
- b. Please describe your procedures for receipt of materials during off-duty hours and for packages that are damaged or leaking.
4. Please confirm that radiation workers (technologist, etc.) will receive instructions specified in 10 CFR 19.12 (enclosed) initially and annually thereafter on a refresher basis.
5. You indicated that your Gene-Trak Beta survey meter will be calibrated by Radiation Monitoring Services, Inc. Please contact the manufacturer to determine if the procedures for operating a commercial calibration service have been filed with the NRC. If so, submit the NRC license number of the manufacturer. If not, you should obtain and submit the step-by-step procedures (including a description of the sources) that the manufacturer will use.

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 83715.

Sincerely,

Cassandra F. Frazier  
Materials Licensing Section

Enclosure: 10 CFR 19.12

RIII

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Mallett

# CONVERSATION RECORD

TIME

DATE

7/15/87

TYPE

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☐ INCOMING  
☒ OUTGOING

ROUTING

NAME/SYMBOL INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

ORGANIZATION (Office, dept., bureau, etc.)

PHONE NO.

Kathy Phillips

Ralston Purina Co.

783-2806

SUBJECT

Co. No. ~~83715~~ 83715

SUMMARY

Need a clarification or addition of P-32. Are you re-instituting your research program.

Ms. Phillips indicated that they are starting their research program again, but this time it will be on a small-time scale (at least presently). If the program is increased they will submit more detailed procedures.

I informed Ms. Phillips that I will need to get clarifications on several items in the procedures submitted in their letter dated June 10, 1987, in reference to the re-instituted research program.

ACTION REQUIRED

Depy Ltr

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

C. FRAZIER

C. Frazier

7/15/87

ACTION TAKEN

SIGNATURE

TITLE

DATE