

NRC FORM 313M (9-81) 10 CFR 35	U.S. NUCLEAR REGULATORY COMMISSION APPLICATION FOR MATERIALS LICENSE – MEDICAL	Approved by OME 3150-0041 Expires 9-30-83
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INSTRUCTIONS – Complete Items 1 through 26 if this is an initial application or an application for renewal of a license. Use supplemental sheets where necessary. Item 26 must be completed on all applications and signed. Retain one copy. Submit original and one copy of entire application to: Director, Office of Nuclear Materials Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. Upon approval of this application, the applicant will receive a Materials License. An NRC Materials License is issued in accordance with the general requirements contained in Title 10, Code of Federal Regulations, Part 30, and the Licensee is subject to Title 10, Code of Federal Regulations, Parts 19, 20 and 35 and the license fee provision of Title 10, Code of Federal Regulations, Part 170. The license fee category should be stated in Item 26 and the appropriate fee enclosed.

1.a. NAME AND MAILING ADDRESS OF APPLICANT (institution, firm, clinic, physician, etc.) INCLUDE ZIP CODE Schoolcraft Memorial Hospital 500 Main Street Manistique, Michigan 49854 TELEPHONE NO.: AREA CODE 906 341 - 2163	1.b. STREET ADDRESS(ES) AT WHICH RADIOACTIVE MATERIAL WILL BE USED (If different from 1.a.) INCLUDE ZIP CODE
2. PERSON TO CONTACT REGARDING THIS APPLICATION David Close, Consultant NMA Medical Physics Services TELEPHONE NO.: AREA CODE 216 641-5799	3. THIS IS AN APPLICATION FOR: (Check appropriate item) a. <input checked="" type="checkbox"/> NEW LICENSE b. <input type="checkbox"/> AMENDMENT TO LICENSE NO. _____ c. <input type="checkbox"/> RENEWAL OF LICENSE NO. _____
4. INDIVIDUAL USERS (Name individuals who will use or directly supervise use of radioactive material. Complete Supplements A and B for each individual.) Cherlyn J. Parrish, M.D.	5. RADIATION SAFETY OFFICER (RSO) (Name of person designated as radiation safety officer. If other than individual user, complete resume of training and experience as in Supplement A.) Cherlyn J. Parrish, M.D.

6.a. RADIOACTIVE MATERIAL FOR MEDICAL USE

RADIOACTIVE MATERIAL LISTED IN:	ITEMS DESIRED "X"	MAXIMUM POSSESSION LIMITS (In millicuries)	ADDITIONAL ITEMS:	MARK ITEMS DESIRED "X"	MAXIMUM POSSESSION LIMITS (In millicuries)
10 CFR 31.11 FOR IN VITRO STUDIES			IODINE-131 AS IODIDE FOR TREATMENT OF HYPERTHYROIDISM		
10 CFR 35.100, SCHEDULE A, GROUP I	X	AS NEEDED	PHOSPHORUS-32 AS SOLUBLE PHOSPHATE FOR TREATMENT OF POLYCYTHEMIA VERA, LEUKEMIA AND BONE METASTASES		
10 CFR 35.100, SCHEDULE A, GROUP II	X	AS NEEDED	PHOSPHORUS-32 AS COLLOIDAL CHROMIC PHOSPHATE FOR INTRACAVITARY TREATMENT OF MALIGNANT EFFUSIONS.		
10 CFR 35.100, SCHEDULE A, GROUP III	X	2000	GOLD-198 AS COLLOID FOR INTRACAVITARY TREATMENT OF MALIGNANT EFFUSIONS.		
10 CFR 35.100, SCHEDULE A, GROUP IV		AS NEEDED	IODINE-131 AS IODIDE FOR TREATMENT OF THYROID CARCINOMA		
10 CFR 35.100, SCHEDULE A, GROUP V		AS NEEDED	XENON-133 AS GAS OR GAS IN SALINE FOR BLOOD FLOW STUDIES AND PULMONARY FUNCTION STUDIES		
10 CFR 35.100, SCHEDULE A, GROUP VI					

6.b. RADIOACTIVE MATERIAL FOR USES NOT LISTED IN ITEM 6.a. (Sealed sources up to 3 mCi used for calibration and reference standards are authorized under Section 35.14(d), 10 CFR Part 35, and NEED NOT BE LISTED.)

ELEMENT AND MASS NUMBER	CHEMICAL AND/OR PHYSICAL FORM	MAXIMUM NUMBER OF MILLICURIES OF EACH FORM	DESCRIBE PURPOSE OF USE
BB01270533 870707 REG3 LIC30 21-16542-03 PDR			<div style="border: 1px solid black; padding: 10px; transform: rotate(-5deg); display: inline-block;"> RECEIVED JUN 5 1987 REGION III </div>

INFORMATION REQUIRED FOR ITEMS 7 THROUGH 23

For Items 7 through 23, check the appropriate box(es) and submit a detailed description of all the requested information. Begin each item on a separate sheet. Identify the item number and the date of the application in the lower right corner of each page. If you indicate that an appendix to the medical licensing guide will be followed, do not submit the pages, but specify the revision number and date of the referenced guide: Regulatory Guide 10.8, Rev. _____ Date: _____

7. MEDICAL ISOTOPES COMMITTEE		15. GENERAL RULES FOR THE SAFE USE OF RADIOACTIVE MATERIAL (Check One)	
<input type="checkbox"/>	Names and Specialties Attached; and	<input checked="" type="checkbox"/>	Appendix G Rules Followed; or
<input type="checkbox"/>	Duties as in Appendix B; or _____ (Check One)	<input type="checkbox"/>	Equivalent Rules Attached
<input checked="" type="checkbox"/>	Equivalent Duties Attached	16. EMERGENCY PROCEDURES (Check One)	
8. TRAINING AND EXPERIENCE		<input checked="" type="checkbox"/>	Appendix H Procedures Followed; or
<input type="checkbox"/>	Supplements A & B Attached for Each Individual User; and	<input type="checkbox"/>	Equivalent Procedures Attached
<input type="checkbox"/>	Supplement A Attached for RSO.	17. AREA SURVEY PROCEDURES (Check One)	
9. INSTRUMENTATION (Check One)		<input type="checkbox"/>	Appendix I Procedures Followed; or
<input checked="" type="checkbox"/>	Appendix C Form Attached; or	<input checked="" type="checkbox"/>	Equivalent Procedures Attached
<input type="checkbox"/>	List by Name and Model Number	18. WASTE DISPOSAL (Check One)	
10. CALIBRATION OF INSTRUMENTS		<input checked="" type="checkbox"/>	Appendix J Form Attached; or
<input type="checkbox"/>	Appendix D Procedures Followed for Survey Instruments; or _____ (Check One)	<input type="checkbox"/>	Equivalent Information Attached
<input checked="" type="checkbox"/>	Equivalent Procedures Attached; and	19. THERAPEUTIC USE OF RADIOPHARMACEUTICALS (Check One)	
<input type="checkbox"/>	Appendix D Procedures Followed for Dose Calibrator; or _____ (Check One)	<input type="checkbox"/>	Appendix K Procedures Followed; or
<input checked="" type="checkbox"/>	Equivalent Procedures Attached	<input type="checkbox"/>	Equivalent Procedures Attached
11. FACILITIES AND EQUIPMENT		20. THERAPEUTIC USE OF SEALED SOURCES	
<input checked="" type="checkbox"/>	Description and Diagram Attached	<input type="checkbox"/>	Detailed Information Attached; and
12. PERSONNEL TRAINING PROGRAM		<input type="checkbox"/>	Appendix L Procedures Followed; or _____ (Check One)
<input checked="" type="checkbox"/>	Description of Training Attached	<input type="checkbox"/>	Equivalent Procedures Attached
13. PROCEDURES FOR ORDERING AND RECEIVING RADIOACTIVE MATERIAL		21. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE GASES (e.g., Xenon - 133)	
<input checked="" type="checkbox"/>	Detailed Information Attached	<input type="checkbox"/>	Detailed Information Attached
14. PROCEDURES FOR SAFELY OPENING PACKAGES CONTAINING RADIOACTIVE MATERIALS (Check One)		22. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE MATERIAL IN ANIMALS	
<input type="checkbox"/>	Appendix F Procedures Followed; or	<input type="checkbox"/>	Detailed Information Attached
<input checked="" type="checkbox"/>	Equivalent Procedures Attached	23. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE MATERIAL SPECIFIED IN ITEM 6.b	
<input type="checkbox"/>	Equivalent Procedures Attached	<input type="checkbox"/>	Detailed Information Attached

24. PERSONNEL MONITORING DEVICES

TYPE <small>(Check appropriate box)</small>		SUPPLIER	EXCHANGE FREQUENCY
a. WHOLE BODY	<input checked="" type="checkbox"/> FILM	Siemen's	Monthly
	<input type="checkbox"/> TLD		
	<input type="checkbox"/> OTHER (Specify)		
b. FINGER	<input type="checkbox"/> FILM		
	<input checked="" type="checkbox"/> TLD	Siemen's	Monthly
	<input type="checkbox"/> OTHER (Specify)		
c. WRIST	<input type="checkbox"/> FILM		
	<input type="checkbox"/> TLD		
	<input type="checkbox"/> OTHER (Specify)		

d. OTHER (Specify)

25. FOR PRIVATE PRACTICE APPLICANTS ONLY

a. HOSPITAL AGREEING TO ACCEPT PATIENTS CONTAINING RADIOACTIVE MATERIAL			
NAME OF HOSPITAL		b. ATTACH A COPY OF THE AGREEMENT LETTER SIGNED BY THE HOSPITAL ADMINISTRATOR.	
MAILING ADDRESS			
CITY	STATE ZIP CODE		
c. WHEN REQUESTING THERAPY PROCEDURES, ATTACH A COPY OF RADIATION SAFETY PRECAUTIONS TO BE TAKEN AND LIST AVAILABLE RADIATION DETECTION INSTRUMENTS.			

26. CERTIFICATE

(This item must be completed by applicant)

The applicant and any official executing this certificate on behalf of the applicant named in Item 1a certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, Parts 30 and 35, and that all information contained herein, including any supplements attached hereto, is true and correct to the best of our knowledge and belief.

a. LICENSE FEE REQUIRED <small>(See Section 170.31, 10 CFR 170)</small>	b. APPLICANT OR CERTIFYING OFFICIAL (Signature) <input checked="" type="checkbox"/>
	(1) NAME (Type of Print) <input checked="" type="checkbox"/> DAVID B. JAHN
(1) LICENSE FEE CATEGORY: 7C	(2) TITLE <input checked="" type="checkbox"/> ADMINISTRATOR
(2) LICENSE FEE ENCLOSED: \$ <u>Exempt</u>	c. DATE <input checked="" type="checkbox"/> 6/3/87

PRIVACY ACT STATEMENT

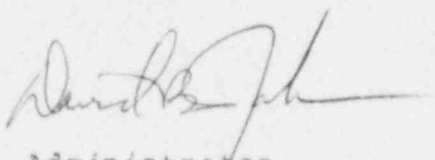
Pursuant to 5 U.S.C. 552a(e)(3), enacted into law by section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission on NRC Form 313M. This information is maintained in a system of records designated as NRC-3 and described at 40 Federal Register 45334 (October 1, 1975).

1. **AUTHORITY** Sections 81 and 161(b) of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2111 and 2201(b)).
2. **PRINCIPAL PURPOSE(S)** The information is evaluated by the NRC staff pursuant to the criteria set forth in 10 CFR Parts 30-36 to determine whether the application meets the requirements of the Atomic Energy Act of 1954, as amended, and the Commission's regulations, for the issuance of a radioactive material license or amendment thereof.
3. **ROUTINE USES** The information may be used: (a) to provide records to State health departments for their information and use; and (b) to provide information to Federal, State, and local health officials and other persons in the event of incident or exposure, for their information, investigation, and protection of the public health and safety. The information may also be disclosed to appropriate Federal, State, and local agencies in the event that the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, or local agency to the extent relevant and necessary for a NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you. A copy of the license issued will routinely be placed in the NRC's Public Document Room, 1717 H Street, N.W., Washington, D.C.
4. **WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION** Disclosure of the requested information is voluntary. If the requested information is not furnished however, the application for radioactive material license, or amendment thereof, will not be processed.
5. **SYSTEM MANAGER(S) AND ADDRESS** Director, Division of Fuel Cycle and Material Safety, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555.

Gentlemen:

Enclosed is a license application for our facility. We were previously licensed under license #21-16542-02. However, we inadvertently allowed this license to expire on March 31, 1987. We are therefore applying for a new license and we request that you expedite the issuing of this license. Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to be "David B. Johnson", written in a cursive style.

Administrator

RADIATION SAFETY COMMITTEE

The requirements of paragraph 35.22 of 10CFR will be followed.

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APPENDIX C
INSTRUMENTATION

1. Survey meters

a. Manufacturer's name: Picker

Manufacturer's model number: 655-186

Number of instruments available: 1

Minimum range: 0 mR/hr to 0.2 mR/hr

Maximum range: 0 mR/hr to 2000 mR/hr

b. Manufacturer's name:

Manufacturer's model number:

Number of instruments available:

Minimum range: mR/hr to mR/hr

Maximum range: mR/hr to mR/hr

2. Dose Calibrator(s)

Manufacturer's name: Capintec

Manufacturer's model number: CRC-12

Number of instruments available: 1

3. Instruments used for diagnostic procedures

Type of Instrument	Manufacturer's Name	Model No.
Scintillation Camera	Searle	LFOV

4. Other (e.g., liquid scintillation counter, area monitor, velometer)

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CALIBRATION OF INSTRUMENTS

As regards the calibration of survey meters and dose calibrators, the dictates of paragraphs 35.50 and 35.51 of 10CFR35 as published on October 16, 1986 will be followed.

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FACILITIES AND EQUIPMENT DESCRIPTION

All radioactive sources are stored in such a manner (lead, concrete, refrigerator) so as to not exceed 2mR/hr at the surface of the barrier.

Mo-99/Tc-99m generator when used will be stored and eluted in the designated area. It will be shielded with lead bricks such that levels from all avenues of approach do not exceed 2.0mR/hr. Spent generators will be stored in the location identified in the attached diagram.

During elution, the eluate will be collected, assayed, and stored in a vial held in a quarter inch lead pig except during brief periods of transfer. Transfer of the eluate or portions of the eluate will be made by the use of syringes retained in lead shields designed for this purpose.

Eluates and compounds made from eluates will be drawn, synthesized, assayed and stored in lead vials or syringes such that levels as measured at contact with a low level survey meter do not exceed 2.0mR/hr except for brief periods during the actual transfer.

Radioactive materials obtained from radiopharmacy suppliers will be stored in their original shipping containers. If necessary, the doses will be placed behind additional shielding to reduce activity levels emitted from the container to 2mR/hr or less.

Syringe shields will be used on all accessories requiring the transfer of radiopharmaceuticals from vial to vial and in drawing up patient doses. Syringe shields will also be used in the administration of doses to patients except when the patient's well-being may be compromised. Under these circumstances, the dose containing syringes will be kept shielded up to the moment of injection.

Steps in the preparation of compounds requiring periods of heating, shaking, agitation or mixing will be performed utilizing lead shielding and/or mechanical or ultrasonic agitation equipment and/or remote handling devices (tongs, forceps, etc.) such that levels during the above period as measured by a low level survey meter do not exceed 2.0mR/hr.

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Facilities and Equipment

Diagram

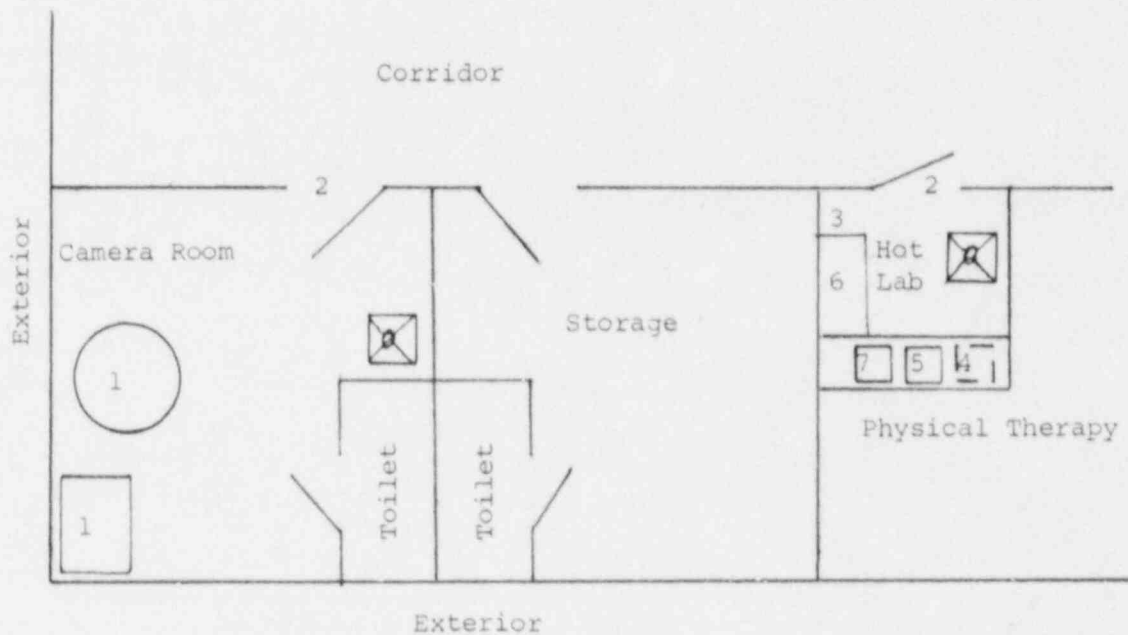
- ☒ Air Supply
- ☒ Air Exhaust

- Scanner
- Uptake/Well
- 1 Camera
- 2 Lockable Door
- 3 Receipt Area
- 4 Generator
- 5 Kit Preparation
- 4 Isotope Storage
- 5 Dose Preparation
- 6 Waste Storage
- 7 Dose Calibrator
- Refrigerator

Adjacent Areas

- ☒ Sink
- ☐ Lead Castle
- Lead Shielding

- 4 Lead Bricks
- 18" L x 18"W x 12"H x 2" T
- 5 L-shield
- 16" L x 12"W x 15"H x 1/2" T
- 6 Waste Containers
- 8" L x 8" W x 10"H x 1/4" T
- L x W x H x T



PERSONNEL TRAINING PROGRAM

In accordance with Section 19.12 of 10 CFR, Part 19, the following is a description of the training required for all personnel who work with or in the vicinity of radioactive materials:

1. The nuclear medicine department will be staffed by individuals who will be classified as occupational employees. These individuals will perform their duties from the radiation safety viewpoint under the direction of the physician(s) named on the license application.
2. Every effort will be made to hire nuclear medicine technology registered or registry eligible personnel to work with radioactive material. Orientation of such personnel for a day or two by the physician(s) named on the license and/or by the supervising technologist will include the following:
 - a. Indicate areas where radioactive materials are used or stored.
 - b. Potential hazards associated with radioactive materials.
 - c. Radiological safety procedures appropriate to their respective duties.
 - d. Pertinent NRC regulations.
 - e. The rules and regulations of the license.
 - f. The pertinent terms of the license.
 - g. Their obligation to report unsafe conditions.
 - h. Appropriate response to emergencies or unsafe conditions.
 - i. Their right to be informed of their radiation exposure and bioassay results.
 - j. Location where the licensee has posted or made available notices, copies of pertinent regulations, and copies of pertinent licenses and license conditions), as required by 10 CFR, Part 19.

If evaluation of the radiation handling techniques of a new technologist is found to be inadequate, arrangements will be made to send the employee for a 40 hour formal course from our consulting physicists, Nuclear Medicine Associates, Cleveland, Ohio. This course combines didactic and clinical training which will include points "b" through "i" listed above, as well as quality control and patient procedures.

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3. Our consulting physicists, mentioned in this addendum, will visit our facility quarterly to review all procedures, equipment and records. Personnel will receive refresher training relative to duties, regulations, or terms of the license during these visits or by the physician(s) named on this license application, or by supplementary training at least annually or more frequently, as needed.
4. Access into areas where radioactive material is stored or used will be restricted for nonoccupational personnel. When it is necessary for nonoccupational personnel to enter these areas, as in the case of certain patients who need special care, personnel so involved will be present under the direction of the nuclear medicine technologist, who will ensure that the exposure of these persons is held to the minimum required for the performance of the nuclear medicine procedure. Further, all nonoccupational personnel will receive instruction as to the location and potential hazards associated with radioactive material during their orientation process and annually thereafter in the form of verbal instructions and/or interdepartment memos.

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PROCEDURES FOR ORDERING AND RECEIVING RADIOACTIVE MATERIAL

1. The chief nuclear medicine technologist or his/her designee will place all orders for radioactive material and will ensure that the requested materials and quantities are authorized by the license, and that possession limits are not exceeded. The receipt area identified in the Item #11 diagram is designed such that radiation levels in unrestricted areas do not exceed the limits specified in 10 CFR 20.105.
2. During normal working hours, carriers will be instructed to deliver radioactive packages directly to Nuclear Medicine. If this is not practical, responsible personnel (indicated in the memorandum below) will sign for packages containing radioactive materials and immediately take them to this location. Alternatively, trained nuclear medicine personnel will sign for and transport packages to the appropriate department.
3. During off-duty hours, supervisory personnel will arrange to have delivery of radioactive packages in accordance with the procedures outlined in the following directive:

TO: Managerial Personnel of: Security, Nursing,
Receiving, Radiology, E.R.

FROM: Radiology Department

SUBJECT: Delivery of packages containing radioactive materials

If couriers or common carriers attempt delivery of packages containing radioactive materials, the supervisor on duty will be contacted. He/she will have the carrier escorted to nuclear medicine by personnel who have been assigned this duty. Alternatively, hospital personnel will deliver the package to the receipt area. Under these conditions, people transporting the packages will receive special training for this purpose. Personnel not trained in the proper handling of radioactive materials are not to personally accept packages containing radioactive materials. The packages will be secured against unauthorized removal. When delivered packages are wet or appear to be damaged, the RSO is to be immediately contacted.* The carrier should be requested to remain until it can be determined that neither he nor the delivery vehicle is contaminated.

*Radiation Safety Officer: Cherlyn J. Parrish, M.D.

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Prepared: 4/17/87

APPENDIX F

PROCEDURES FOR SAFELY OPENING PACKAGES CONTAINING RADIOACTIVE MATERIAL

1. Special requirements will be followed for packages containing quantities of radioactive material in excess of the Type A quantity limits as specified in paragraphs 20.205 (a)(1) and (c)(1) of 10 CFR Part 20 (more than 20 Ci for Mo-99 and Tc-99m). They will be monitored for surface contamination and external radiation levels within 3 hours after receipt if received during working hours or within 18 hours after receipt if received after working hours, in accordance with the requirements of paragraphs 20.205 (a) through (c). All shipments of liquids greater than exempt quantities will be tested for leakage. The NRC Regional Office will be notified in accordance with the regulations if removable contamination exceeds 0.01 uCi/100 cm² or if external radiation levels exceed 200 mR/hr at the package surface or 10 mR/hr at 1m.
2. For all packages, the following additional procedures for opening packages will be carried out:
 - a. Put on gloves to prevent hand contamination.
 - b. Visually inspect package for sign of damage (e.g., wetness, crushed). If damage is noted, stop procedure and notify Radiation Safety Officer.
 - c. Measure exposure rate at 1m from package surface and record. If > 10 mR/hr, stop procedure and notify Radiation Safety Officer.
 - d. Measure surface exposure rate and record. If > 200 mR/hr, stop procedure and notify Radiation Safety Officer.
 - e. Open the package with the following precautionary steps:
 - (1) Open the outer package (following manufacturer's directions if supplied) and remove packing slip.
 - (2) Open inner package and verify that contents agree with those on packing slip. Compare requisition*, packing slip, and label on bottle.

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*In the case of special order (e.g., therapy doses) also compare with physician's written request.

- (3) Check integrity of final source container (i.e., inspect for breakage of seals or vials, loss of liquid, and discoloration of packaging material).
- (4) Check also that shipment does not exceed possession limits.
- f. Wipe external surface of final source container shield and remove wipe to low background area. Check wipes with a thin-end window G-M survey meter, and take precaution against the spread of contamination as necessary.
- g. Monitor the packing material and packages for contamination before discarding.
 - (1) If contaminated, treat as radioactive waste.
 - (2) If not contaminated, obliterate radiation labels before discarding in regular trash.
- 3. Maintain records of the results of checking each package.

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ADDENDUM ITEM #14

The procedure for safely opening packages containing radioactive materials as outlined in Appendix F, Licensing Guide 10.8 will be subscribed to with the following exceptions. The procedures shall not be applicable to prepackaged in vitro kits received without evidence of shipping damage except that radiation labels will be obliterated. Evaluation of final source container wipe smears will be performed with a survey meter listed in Item #9 of license application.

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Prepared: 4/17/87

APPENDIX G

GENERAL RULES FOR THE SAFE USE OF RADIOACTIVE MATERIAL IN THE NUCLEAR MEDICINE DEPARTMENT

1. Wear laboratory coats or other protective clothing at all times in areas where radioactive materials are used.
2. Wear disposable gloves at all times while handling radioactive materials.
3. Monitor hands and clothing for contamination after each procedure or before leaving the area.
4. Always use syringe shields for routine preparation of patient doses and administration to patients, except in circumstances such as pediatric cases when their use would compromise the patient's well-being. In these exceptional cases, use other protective methods such as remote delivery of the dose (e.g., through use of a butterfly valve).
5.
 - a. Do not eat, drink, smoke, or apply cosmetics in any area where radioactive material is stored or used.
 - b. Do not store food, drink, or personal effects with radioactive material.
6.
 - a. Assay each patient dose in the dose calibrator prior to administration. Do not use any doses that differ from the prescribed dose by more than 10 percent.
 - b. For therapeutic doses, also check the patient's name, the radionuclide, the chemical form, and the activity vs. the order written by the physician who will perform the procedure.
7. Wear personnel monitoring devices (film badge or TLD) at all times while in areas where radioactive materials are used or stored. These devices should be worn at chest or waist level. Personnel monitoring devices when not being worn to monitor occupational exposures should be stored in a designated low background area.
8. Wear TLD finger badges during elution of generator and preparation, assay, and injection of radiopharmaceuticals.
9. Dispose of radioactive waste only in specially designated and properly shielded receptacles.

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10. Never pipette by mouth.
11. Survey generator, kit preparation, and injection areas for contamination after each procedure or at the end of the day. Decontaminate if necessary.
12. Confine radioactive solutions in covered containers plainly identified and labeled with name of compound, radionuclide, date, activity, and radiation level, if applicable.
13. Always transport radioactive material in shielded containers.

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**APPENDIX H
EMERGENCY PROCEDURES**

Minor Spills

1. **NOTIFY:** Notify persons in the area that a spill has occurred.
2. **PREVENT THE SPREAD:** Cover the spill with absorbent paper.
3. **CLEAN UP:** Use disposable gloves and remote handling tongs. Carefully fold the absorbent paper and pad. Insert into a plastic bag and dispose of in the radioactive waste container. Also insert into the plastic bag all other contaminated materials such as disposable gloves.
4. **SURVEY:** With a low-range, thin window G-M survey meter, check the area around the spill, hands and clothing for contamination.
5. **REPORT:** Report incident to the Radiation Safety Officer.

Major Spills

1. **CLEAR THE AREA:** Notify all persons not involved in the spill to vacate room.
2. **PREVENT THE SPREAD:** Cover the spill with absorbent pads, but do not attempt to clean it up. Confine the movement of all personnel potentially contaminated to prevent the spread.
3. **SHIELD THE SOURCE:** If possible, the spill should be shielded, but only if it can be done without further contamination or without significantly increasing your radiation exposure.
4. **CLOSE THE ROOM:** Leave the room and lock the door(s) to prevent entry.
5. **CALL FOR HELP:** Notify the Radiation Safety Officer immediately.
6. **PERSONNEL DECONTAMINATION:** Contaminated clothing should be removed and stored for further evaluation by the Radiation Safety Officer. If the spill is on the skin, flush thoroughly and then wash with mild soap and lukewarm water.

RADIATION SAFETY OFFICER: Cherlyn J. Parrish, M.D.

OFFICE PHONE: Ext. 255

HOME PHONE: 341-6911

ALTERNATIVE NAMES AND TELEPHONE NUMBERS DESIGNATED BY RADIATION SAFETY OFFICER:

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SURVEY PROCEDURES

- A. Routine elution, preparation and designated injection areas will be surveyed at the end of each day of use with a G-M survey meter and decontaminated, if necessary.
- B. Laboratory areas where only small quantities of radioactive material are used (less than 200 uCi) will be surveyed monthly.
- C. All other laboratory areas will be surveyed weekly.
- D. The weekly and monthly survey will consist of:
 - 1. A measurement of radiation levels with a survey meter sufficiently sensitive to detect 0.1 mR/hr.
 - 2. A series of wipe tests to measure contamination levels. Analysis of wipe tests will be performed using a low level G-M survey meter.

Action levels for smear analysis using the G-M survey meter will be set at any response above background. If action levels of removable contamination are found, decontamination efforts will be initiated to provide for clean-up or to prevent spread. In order to avoid unnecessary personnel exposure, contamination strongly suspected as being caused by Tc-99m may be shielded and/or covered to prevent spread and be allowed to decay.

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E. A record will be kept of the daily, weekly or monthly survey results, including negative results. Survey records will be maintained for at least two years. The record will include:

1. Location, date and equipment used.
2. Initials of person conducting the survey.
3. Drawing of area surveyed, identifying relevant features such as active storage areas, active waste areas, etc.
4. Measured exposure rates, keyed to location on drawing (point out rates that require corrective action).
5. Detected contamination levels, keyed to locations on drawing.
6. Corrective action taken in the case of contamination or excessive exposure rates, reduced contamination levels or exposure rates after corrective action, and any appropriate comments.

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APPENDIX J

WASTE DISPOSAL

1. Liquid waste will be disposed of:

- ☒ A. In the sanitary sewer system in accordance with 20.303 of 10 CFR, Part 20.
- ☒ B. Held for decay until radiation levels, as measured in a low background area with a low-level survey meter and with all shielding removed, have reached background levels. All radiation labels will be removed or obliterated, and the generators will be disposed of as normal trash.
- ☒ C. Other (specify): Return to radiopharmacy.

2. Mo-99/Tc-99m generators will be:

- ☒ A. Returned to manufacturer for disposal.
 - ☒ B. Held for decay until radiation levels, as measured in a low background area with a low-level survey meter and with all shielding removed, have reached background levels. All radiation labels will be removed or obliterated, and the generators will be disposed of as normal trash.
 - ☐ C. Disposed of by commercial waste disposal service.
-
- ☒ D. Other (specify): Return to radiopharmacy.

3. Other solid waste will be:

- ☒ A. Held for decay until radiation levels, as measured in a low background area with a low-level survey meter and with all shielding removed, have reached background levels. All radiation labels will be removed or obliterated, and the waste will be disposed of in normal trash.
 - ☐ B. Disposed of by commercial waste disposal service.
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- ☒ C. Other (specify): Return to radiopharmacy.

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Prepared: 4/17/87

Model Program for Maintaining Occupational
Radiation Exposures at Medical Institutions ALARA

Schoolcraft Memorial Hospital
(Licensee's Name)

April 17, 1987
(Date)

I. Management Commitment

- a. We, the management of this facility are committed to the program described in this paper for keeping exposures (individual and collective) as low as reasonably achievable (ALARA). In accord with this commitment, we hereby describe an administrative organization for radiation safety and will develop the necessary written policy, procedures and instructions to foster the ALARA concept within our institution. The organization will include a Radiation Safety Committee (RSC) and a Radiation Safety Officer (RSO).
- b. We will perform a formal annual review of the radiation safety program including ALARA considerations. This shall include reviews of operating procedures and past exposure records, inspections, etc., and consultations with the radiation protection staff or outside consultants.
- c. Modification to operating and maintenance procedures and to equipment and facilities will be made where they will reduce exposures unless the cost, in our judgement, is considered to be unjustified. We will be able to demonstrate, if necessary, that improvements have been sought, that modifications have been considered, and that they have been implemented where reasonable. Where modifications have been recommended but not implemented, we will be prepared to describe the reasons for not implementing them.
- d. In addition to maintaining doses to individuals as far below the limits as is reasonably achievable, the sum of the doses received by all exposed individuals will also be maintained at the lowest practical level. It would not be desirable, for example, to hold the highest doses to individuals to some fraction of the applicable limit if this involved exposing additional people and significantly increasing the sum of radiation doses received by all involved individuals.

II. Radiation Safety Committee (RSC)

a. Review of Proposed Users and Uses

1. The RSC will thoroughly review the qualifications of each applicant with respect to the types and quantities of materials and uses for which he has applied to assure that the applicant will be able to take appropriate measures to maintain exposure ALARA.
2. When considering a new use of byproduct material, the RSC will review the efforts of the applicant to maintain exposure ALARA. The user should have systematized procedures to ensure ALARA, and shall have incorporated the use of special equipment such as syringe shields, rubber gloves, etc., in his proposed use.
3. The RSC will ensure that the user justifies his procedures and that dose will be ALARA (individual and collective).

b. Delegation of Authority

The judicious delegation of RSC authority is essential to the enforcement of an ALARA program.

1. The RSC will delegate authority to the RSO for enforcement of the ALARA concept.
2. The RSC will support the RSO in those instances where it is necessary for the RSO to assert his authority. Where the RSO has been overruled, the Committee will record the basis for its action in the minutes of the Committee's quarterly meeting.

c. Review of ALARA Program

1. The RSC will encourage all users to review current procedures and develop new procedures as appropriate to implement the ALARA concept.

2. The RSC will perform a quarterly review of occupational radiation exposure with particular attention to instances where Investigational Levels in Table I below are exceeded. The principle purpose of this review is to assess trends in occupational exposure as an index of the ALARA program quality and to decide if action is warranted when Investigational Levels are exceeded (see paragraph VI).
3. The RSC will evaluate our institution's overall efforts for maintaining exposures ALARA on an annual basis. This review will include the efforts of the RSO, authorized users, and workers as well as those of management.

III. Radiation Safety Officer (RSO)

a. Annual and Quarterly Review

1. Annual review of the Radiation Safety Program. The RSO will perform an annual review of the Radiation Safety Program for adherence to ALARA concepts. Reviews of specific procedures may be conducted on a more frequent basis.
2. Quarterly review of Occupational Exposures. The RSO will review at least quarterly the external radiation exposures of authorized users and workers to determine that their exposures are ALARA in accordance with the provisions of paragraph VI of this program.
3. Quarterly review of records of Radiation Level Surveys. The RSO will review radiation levels in unrestricted and restricted areas to determine that they were at ALARA levels during the previous quarter.

b. Education Responsibilities for an ALARA Program

1. The RSO will schedule briefings and educational sessions to inform workers of ALARA program efforts.
2. The RSO will assure that authorized users, workers and ancillary personnel who may be exposed to radiation will be instructed in the ALARA philosophy and informed that management, the RSC and the RSO are committed to implementing the ALARA concept.

c. Cooperative Efforts for Development of ALARA Procedures

1. The RSO will be in close contact with all users and workers in order to develop ALARA procedures for working with radioactive materials.
2. The RSO will establish procedures for receiving and evaluating the suggestions of individual workers for improving health physics practices and encourage the use of those procedures.

d. Reviewing Instances of Deviation from Good ALARA Practices

The RSO will investigate all known instances of deviation from good ALARA practices; and, if possible, determine the causes. When the cause is known, the RSO will require changes in the program to maintain exposures ALARA.

IV. Authorized Users

a. New Procedures Involving Potential Radiation Exposures

1. The authorized user will consult with, and receive the approval of, the RSO and/or RSC during the planning stage before using radioactive materials for a new procedure.
2. The authorized user will evaluate all procedures before using radioactive materials to ensure that exposures will be kept ALARA. This may be enhanced through the application of trial runs.

b. Responsibility of the Authorized User to Those He Supervises

1. The authorized user will explain the ALARA concept and his commitment to maintain exposures ALARA to all of those he supervises.
2. The authorized user will ensure that those under his supervision who are subject to occupational radiation exposure are trained and educated in good health physics practices and in maintaining exposures ALARA.

V. Persons Who Receive Occupational Radiation Exposure

- a. The worker will be instructed in the ALARA concept and its relationship to his working procedures and work conditions.

- b. The worker will know what recourses are available if he feels that ALARA is not being promoted on the job.

VI. Establishment of Investigational Levels in Order to Monitor Individual Occupational External Radiation Exposures

This institution hereby establishes Investigational Levels for occupational external radiation exposure which, when exceeded, will initiate review or investigation by the Radiation Safety Committee and/or the Radiation Safety Officer. The Investigational Levels that we have adopted are listed in Table I below. These levels apply to the exposure of individual workers.

TABLE 1

Investigational levels-
(mrems per calendar quarter)

	<u>LEVEL I</u>	<u>Level II</u>
1. Whole body; head and trunk; active blood-forming organs; lens of eyes; or gonads	125	375
2. Hands and forearms; feet and ankles	1875	5625
3. Skin of whole body *	750	2250

* Not normally applicable to nuclear medicine operations except those using significant quantities of beta emitting isotopes.

The Radiation Safety Officer will review and record on Form NRC-5, Current Occupational External Radiation Exposures, or an equivalent form (e.g. dosimeter processor's report), results of personnel monitoring, not less than once in any calendar quarter, as is required by 10 CFR 20, 20.401. The following actions will be taken at the Investigational Levels as stated in Table 1:

- a. Quarterly exposure of individuals to less than Investigational Level I.

Except when deemed appropriate by the RSO, no further action will be taken in those cases where an individual's exposure is less than Table I values for the Investigational Level I.

- b. Personnel exposures equal to or greater than Investigational Level I, but less than Investigational Level II.

The RSO will review the exposure of each individual whose quarterly exposures equal or exceed Investigational Level I. He will report the results of his reviews at the first RSC meeting following the quarter when the exposure was recorded. If the exposure does not equal or exceed Investigational Level II, no action related specifically to the exposure is required unless deemed appropriate by the Committee. The Committee will, however, consider each such exposure in comparison with those of others performing similar tasks as an index of ALARA program quality and will record the review in the Committee minutes.

- c. Exposure equal to or greater than Investigational Level II.

The RSO will investigate in a timely manner the cause(s) of all personnel exposures equaling or exceeding investigational Level II and, if warranted, take action. A report of the investigation, actions taken, if any, and a copy of the individual's Form NRC-5 or its equivalent will be presented to the RSC at the first RSC meeting following completion of the investigation. The details of these reports will be recorded in the Committee minutes. Committee minutes will be sent to the management of this institution for review. The minutes, containing details of the investigation, will be made available to NRC inspectors for review at the time of the next inspection.

- d. Re-establishment of an individual occupational worker's Investigational Level II Above That Listed in Table I.

In cases where a worker's or a group of worker's exposures need to exceed Investigational Level II, a new, higher Investigational Level II may be established on the basis that it is consistent with good ALARA practices Investigational Level II will be documented.

The Radiation Safety Committee will review the justification for, and will approve, all revisions of Investigational Level II. In such cases, when the exposure equals or exceeds the newly established Investigational Level II, those actions listed in paragraph c above will be followed.