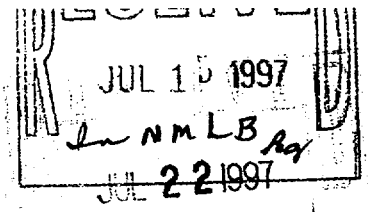




DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE MEDICAL OPERATIONS AGENCY
BROOKS AIR FORCE BASE, TEXAS



1 Jul 1997

MEMORANDUM FOR USNRC, REGION IV
ATTENTION: MS. LINDA MCLEAN

From: HQ AFMOA/SGOR
8901 18th St
Brooks AFB TX 78235-5217

SUBJECT: Request for Waiver to 10 CFR 35.315(a)(4) and 35.415(a)(4)

Attached is a memorandum from the 74 Medical Group at Wright-Patterson AFB OH requesting a waiver be granted to the subject survey requirements. The area above room 2N4 is an outside roof area that is controlled by the use of locked fences with the Permit RSO controlling the keys. During the winter months and other periods of bad weather, a serious safety hazard is created to individuals surveying the roof area to comply with subject requirements. USNRC inspectors, USAF inspectors, and members of this office have all seen the area in question and have verbally agreed with the safety concerns and the control of the area. Let me reiterate, this request is only for the roof area of room 2N4 at the Wright-Patterson Medical Center.

Questions concerning this request can be addressed to our office at (210) 536-3331; Fax: (210) 536-4382; E-mail: feeser_p@msa01.brooks.af.mil. Your help on this mater is greatly appreciated.

PAUL H. FEESER, Maj, USAF, BSC
Acting Chief, USAF Radioisotope Committee Secretariat
Office of the Surgeon General

Attachment:
74 MDG/SGSXP Memo, 20 Nov 1995 w/Atch

cc:
74 MDG/SGSXP
88 ABW/EMB
HQ AFMC/SGCR

B/8

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DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE MATERIEL COMMAND
WRIGHT-PATTERSON AIR FORCE BASE, OHIO

20 NOV 95

MEMORANDUM FOR HQ AFMOA/SGPR
8901 18th Street
Brooks AFB TX 78235-5217

FROM: 74 MDG/SGSXP
4881 Sugar Maple Drive
Wright-Patterson AFB OH 45433-5529

SUBJECT: Request for Permit Amendment, Permit No. 34-04682-1AFP, Docket 030-02732

1. Request that USAF Radioactive Materials Permit No. 34-04682-1AFP be amended as follows:

a. Grant a waiver to 10 CFR 35.315(a)(4) and 10 CFR 35.415(a)(4) to the requirement to survey contiguous restricted areas immediately following dose administration with radiopharmaceuticals for doses over 30 millicuries or after implanting brachytherapy sources. A waiver is specifically requested for the roof area directly over 2N4 which is used for radiopharmaceutical therapy and brachytherapy.

(1) We propose the following procedure be used in lieu of surveys to ensure that the requirements for exposure to members of the general public are met, specifically, the requirement in 10 CFR 20.1301 (a) (1) requiring the total effective dose equivalent to be limited to less than 100 mrem in a year.

(a) The area above 2N4 shall be fenced and locked to prevent access to the roof area. (See photo)

(b) The key to the area shall be available only through the RSO or Radiation Safety Office.

(c) The fenced area above 2N4 shall be a restricted area during all brachytherapy procedures and radiopharmaceutical therapy over 30 millicuries.

(d) The fenced area shall be posted as a radiation area since, with high loadings, dose rates of up to 2 mrem/hour are possible. The posting shall also state "Authorized Entry Only Contact Radiation Safety Officer." (See photo)

(e) If maintenance in the fenced roof area is required, the RSO shall be responsible for ensuring that exposures to any one individual remain below 100 mrem/year

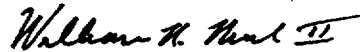


by either arranging for that work to take place when no therapy patient is present or performing surveys and supervising the work crew to ensure that exposures are less than 100 mrem/year to any individual. Surveys performed on previous patients indicate no exposure within the fenced area above 2 mrem/hour (the maximum measured exposure rate was 1.8 mrem/hour for a heavily loaded Cs-137 patient). No physical plant equipment is present in or accessed from this area of the roof. An emergency roof repair would require only a few hours of access to this area.

(2) This waiver is requested to ensure staff safety. Performing surveys requires a staff member to climb through a window onto one roof area and then climb over a waist high wall onto another area of the roof. There are no guard rails and the drop to the ground is approximately 25 feet. The roof area is unprotected from wind gusts, and weather. (See photo of exit from window)

b. Request that our permit renewal application which was submitted 27 JAN 94 and is currently under review be amended similarly if this waiver is granted by the NRC.

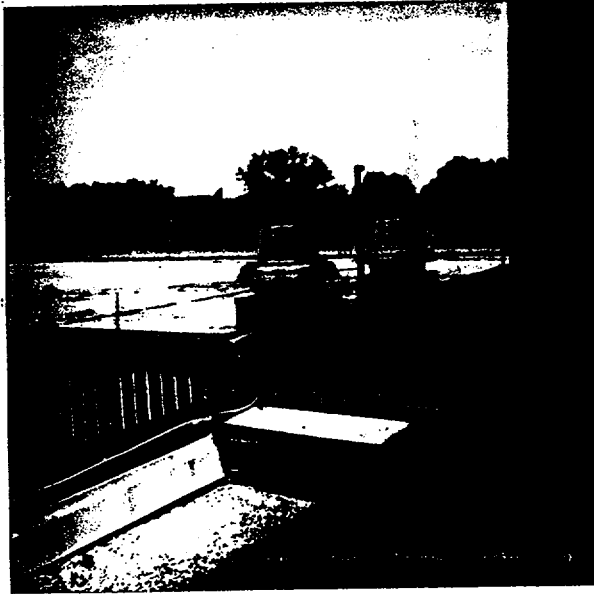
2. If you have any additional questions or comments, please contact the Radiation Safety Office at DSN 787-9481.



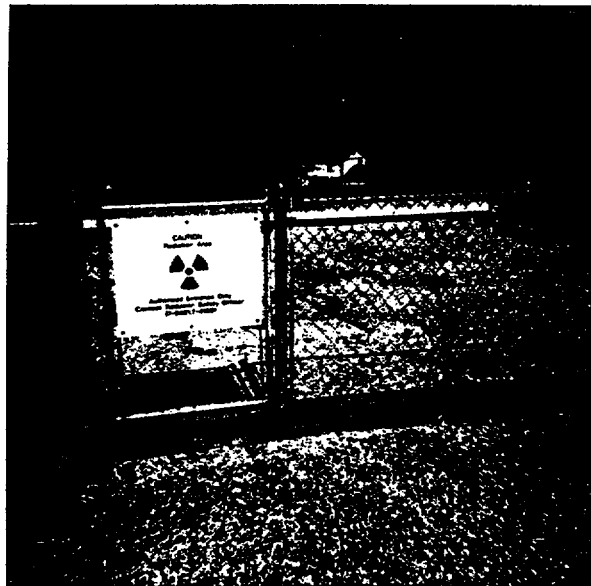
William R. Ruck II
Captain, USAF, BSC
Radiation Safety Officer

Attachment:
Photographs of Roof Above 2N-4

cc:
74 MDG/SG (Brig Gen Mabry)
74 MDG/SGSL (Lt Col Romeyn)
88 ABW/EMB (Mr. Mays)



74 MDG/SGSXP Ltr 20 NOV 95
Route to/from roof area over
2N-4



74 MGD/SGSXP Ltr 20 NOV 95
Fenced area above 2N-4