



**American
Red Cross**

Northeastern Pennsylvania Region
29 New Commerce Boulevard
Ashley, PA 18706
(570) 823-7164
www.redcross.org

Blood Services

Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

37-30073-01
03033294

01/17/2005

RE: Amendment Request – Expedited approval requested – URGENT

I am writing to request an amendment to our Radioactive Materials License (License #37-30073-01). We urgently need license condition #16E changed so that the leak tests can be collected and analyzed by our Radiation Physics consultant, who is an authorized representative of the licensee (by contract), and also a Certified Health Physicist (CHP). Ms. Catherine Anderko, our consultant, has been associated with our radiation safety program for 11 years, and is well familiar with both the irradiator and the leak testing process. The leak test program will be as specified in the attachment. The leak testing will be a courtesy service by the consultant.

The urgent need of this request is due to the fact that the company that has been analyzing our leak tests for the past few years, RSO Inc. of Laurel, Md., has been unable to meet the stringent contractor requirements of the American Red Cross, and leak testing is now due. If there are any questions please contact me through one of the means listed below:

Cell Phone [REDACTED]
Phone (570) 821-2406
E-mail LindnerJ@usa.redcross.org
Fax (570) 825-4257

If additional information is needed relative to the leak test procedure, please contact Ms. Anderko directly at work (570) 271-5917 during business hours, or after hours at (570) 204-2452 (cell).

Thank you for your time and immediate attention to this request.

Sincerely,

Jeffrey Lindner
Radiation Safety Officer

**PERSONAL INFORMATION WAS REMOVED
BY NRC. NO COPY OF THIS INFORMATION
WAS RETAINED BY THE NRC.**

136300
NMCS/RQM MATERIALS-002

American Red Cross Blood Services
29 New Commerce Blvd
Ashley Pa. 18706

NRC Amendment Request
January 14, 2005

Leak Testing Program

1. Individual(s) responsible for leak testing:
 - a. Sample collection will be performed as a courtesy by the Radiological Physics Consultant, who has been associated with the Red Cross irradiator for 11 years. The consultant is a Certified Health Physicist. Alternately, sample collection will be performed by the Radiation Safety Officer, an employee of the Red Cross, under the supervision of the consultant, or by persons specifically licensed by the NRC to perform leak tests.
 - b. Samples will be counted only by the consultant, or by persons specifically licensed by the NRC to analyze leak test samples.

2. Sample Collection:
 - a. The irradiator will be surveyed with a GM instrument prior to leak testing to demonstrate that radiation levels are consistent with monthly survey results.
 - b. Sample collection locations will be those specified in the manufacturers instructions. A minimum of two samples will be collected, representing those areas that are as close to the sources as possible and most likely to show evidence of leakage if in fact the sources were leaking.
 - c. Leak test materials shall consist of an appropriate collection medium such as moistened Q-tips or filter paper, and a transport medium such as envelopes or test tubes to prevent cross-contamination of samples. The area wiped will be approximately 100 cm². Each sample will be surveyed with a GM detector immediately following collection. Samples will be analyzed promptly following collection and no later than 24 hrs after collection.
 - d. Leak tests shall be performed at a minimum of semi-annually, following any significant maintenance which involves the sources or source housing, or at any other time deemed appropriate by the RSO or consultant.

3. Sample Analysis:
 - a. The instrument used to analyze the wipes will be capable of detecting 0.005 uCi of activity; a NaI MCA well counter or similar. The MDA and counting efficiency will be measured and recorded.
 - b. If radioactivity is detected at levels exceeding 0.005 uCi, the irradiator will be immediately taken out of service, the irradiator room locked, and the manufacturer and NRC notified.
 - c. Records of leak tests will be maintained for the life of the license, and contain all of the information specified in the NRC regulations.

This is to acknowledge the receipt of your letter/application dated

1/17/2005, and to inform you that the initial processing which includes an administrative review has been performed.

AMEND. 37-30073-01
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 136 300.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.

BETWEEN: : (FOR LFMS USE)
 : INFORMATION FROM LTS
 : -----
 :
 License Fee Management Branch, ARM : Program Code: 03510
 and : Status Code: 0
 Regional Licensing Sections : Fee Category: 3E
 : Exp. Date: 20131031
 : Fee Comments: _____
 : Decom Fin Assur Reqd: N
 :

LICENSE FEE TRANSMITTAL

A. REGION I

1. APPLICATION ATTACHED
 Applicant/Licensee: AMERICAN RED CROSS BLOOD SERVICES
 Received Date: 20050117
 Docket No: 3033294
 Control No.: 136300
 License No.: 37-30073-01
 Action Type: Amendment

2. FEE ATTACHED
 Amount: _____
 Check No.: _____

3. COMMENTS
 Signed M. A. Perkins
 Date 1/18/2005

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /__/)

1. Fee Category and Amount: _____
 2. Correct Fee Paid. Application may be processed for:
 Amendment _____
 Renewal _____
 License _____
 3. OTHER _____

Signed _____
 Date _____