



DEPARTMENT OF THE ARMY
WALTER REED ARMY MEDICAL CENTER
WASHINGTON, DC 20307-5001

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REPLY TO
ATTENTION OF:

June 2, 1994

Health Physics Office

SUBJECT: Additional Information for Review of Renewal of U.S.
Nuclear Regulatory Commission License No. 08-01738-02, mail
control No. 117725

Nuclear Materials Safety Branch
Division of Radiation Safety and Safeguards
ATTENTION: Mr. Thomas K. Thompson
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

QMP
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Dear Mr. Thompson:

In response to our phone conversation of May 25, 1994,
pertaining to the renewal of License No. 08-01738-02, Control No.
117725, the following additional information is provided:

1. A memorandum dated 13 May 1994, was forwarded through
Army channels requesting that NRC License No. 08-01738-02 and NRC
License No. 08-01738-03 be amended to approve myself as the
Radiation Safety Officer on both licenses. Headquarters,
Department of the Army, Office of the Surgeon General, Falls
Church, VA, forwarded the request to the NRC, Region I, per
memorandum dated June 1, 1994. The memorandums with enclosures
are provided as you requested as enclosure 1.

2. We have reviewed the provisions of 10 CFR 30.32(i). The
limits for all conditions of 10 CFR 30.72, Schedule C have been
reviewed, and under the current and requested license limits we
do not exceed any specific activity limits. In addition, the sum
of our license limits for any isotope divided by the Schedule C
appropriate activity limit does not exceed 1. This would
indicate that our license is exempt from the provisions of 10 CFR
30.32(i). This calculation will remain on file at the Health
Physics Office.

3. The Nuclear Medicine Service has revised the Quality
Management Program (QMP), and the revised QMP from the Nuclear
Medicine Service dated March 22, 1994, is provided as
enclosure 2. The Radiation Oncology Service QMP dealing with
brachytherapy was extracted from the Radiation Oncology Service
Policy and Procedure Manual and is provided as enclosure 3.

4. During our phone conversation on May 25, 1994, you
indicated a new NRC policy precluded issuing a blanket statement

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for the decay-in-storage of any radioisotope with a half-life of less than 90 days, as is currently listed as Condition 18 of our license. As requested we submit the following information to support the decay-in-storage of radioactive material:

a. In addition to authorization to hold radioactive material with a half-life of less than 65 days for decay-in-storage before disposal in ordinary trash, we request approval for decay-in-storage for the following radioactive materials: cobalt-58, iridium-192, sulfur-35, and scandium-46. These radioactive materials all have half-life of greater than 65 days, but less than 90 days, and are currently authorized on our license for decay-in-storage.

b. Justification for decay-in-storage. This request will support reducing the volume of low level radioactive waste, which at some point in the future must be disposed of as low level radioactive waste. Sulfur-35, cobalt-58, iridium-192, and scandium-46, account for a significant volume of the low level radioactive waste generated at this facility. Allowing decay-in-storage, and then disposing of this waste after proper monitoring in ordinary trash would significantly reduce our volume of low level radioactive waste. With the unavailability of any low level radioactive waste site, all waste classified as radioactive waste must be stored on-site. Allowing us to decay the waste to background levels frees up space to accommodate radioactive waste that must be stored until the Pennsylvania low level radioactive waste site is operational. It will also significantly reduce the future costs incurred to dispose of low level radioactive material at Walter Reed Army Medical Center. As you know, the date that the Pennsylvania site will open is uncertain. Decay-in-storage of this waste will insure that we have sufficient space to hold radioactive waste prior to the opening of the Pennsylvania low level burial grounds. This request supports the mandates of Congress, the States, and U.S. Army policy to minimize the volume of low level radioactive waste generated, while adhering to strict safety standards that protect the general population and the environment.

I hope you will find the above information sufficient to complete your processing of our application. Any additional questions or comments pertaining the renewal of our license should be directed to the undersigned at (301) 427-5161.

Enclosures
as


WILLIAM B. JOHNSON
Lieutenant Colonel, U.S. Army
Chief, Health Physics Office