

**From:** Sandra Gabriel  
**To:** agooch2@aol.com  
**Date:** Thu, May 19, 2005 9:37 PM  
**Subject:** NRC license amendment request, mail control 136990

Reference: Prime Med PC  
License: 37-30436-01  
Docket: 03034669  
Mail Control: 136990

To: Adrian Gooch

Please provide the following information regarding the amendment request to add HDR. You may fax a signed copy of your responses to my attention at 610-337-5269, referencing mail control 136990. Please leave me an e-mail or voicemail message when you send the fax so that I will know to look for it.

Please reply by e-mail to confirm that you received this message.

1) Item 8 of your application discussed training. You stated that facility specific training in managing emergencies will be conducted annually. Please confirm that authorized users, authorized medical physicists, and operators will participate in annual drills of emergency procedures, as required by 10 CFR 35.610(e).

2) Item 9.4B of your application addressed spotchecks.

a) Please confirm that daily spotchecks will meet the requirement of 35.643(a)(2) to assure proper operation of source exposure indicator lights on the remote after loader unit, on the control console, and in the facility.

b) Specify the method you will use to check proper operation of radiation area monitors.

3) Item 9.4B of your application also addressed full calibration measurements. It is not necessary to submit these procedures, which will be reviewed at inspection. We did not review your submission, however please note the requirement of 35.633(b)(3) to check source retraction with the backup battery upon power failure.

4) Item 9.5B of your application stated that a simulator unit will be located in the same room as the HDR unit and that administrative controls will be used to prevent simultaneous operation of the two units.

a) When this room is unlocked for simulator use, what is the method to secure the HDR unit? For example, will it be locked in a closet or cabinet, or secured by a cable that is locked in place?

b) Have you considered engineering controls rather than administrative controls to prevent simultaneous operation of the two units? If so, why were these rejected? Describe the administrative controls and your procedure to assure they are effective.

5) Item 9.5C of your application stated that if the area monitor(s) are not operable, individuals will use a portable survey instrument to enter the room following use of the afterloader. Please note that 35.643(e) requires that if daily spotchecks show a radiation monitor is not operating properly, you must lock the control console in the off position and not use the unit except as may be necessary to repair, replace, or check the malfunctioning system. Therefore your statement is acceptable only for malfunctions that occur after successful completion of the daily spotcheck.

6) Appendix III of your application included emergency procedures. Please confirm that these procedures will be located at the HDR unit console and that names/telephone numbers of the authorized user, authorized medical physicist, and RSO will be posted at the console, as required by 35.610(b-c).

7) You will be approved as authorized medical physicist (AMP) for this license based on your status as AMP within the past 7 years on the license of The Cancer Center of Wyoming Valley (your application stated that you served as RSO under this license but neglected to state that you were also AMP). No response to this item is necessary.

You may contact me by e-mail with any questions. I will attempt to issue the license amendment within 1 week of receipt of your responses to these questions. If you wish, we can fax a copy at the same time it is mailed. Please supply a fax number. Thank you.

Sandy Gabriel  
Senior Health Physicist  
Medical Branch  
NRC Region I  
610-337-5182

**Mail Envelope Properties**

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