



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

June 3, 2005

Docket No. 03015163
Control No. 136618

License No. 37-06864-06

Kathleen Kinslow
Chief Operating Officer
Pennsylvania Hospital
Eighth and Spruce Streets
Philadelphia, PA 19107-6192

SUBJECT: PENNSYLVANIA HOSPITAL, VOIDANCE OF APPLICATION FOR LICENSE AMENDMENT, CONTROL NO. 136618

Dear Ms. Kinslow:

This concerns the subject application for an Amendment to your material license to authorize use of an Elekta Leksell gamma stereotactic radiosurgery unit. Because your Radiation Safety Officer informed us in a May 11, 2005 telephone conversation that you will not be able to supply the additional information required to complete the requested action for some time, we have voided your application. This action is taken without prejudice to the resubmission of your request.

In your resubmission, we suggest that you follow the format listed in NUREG-1556, Volume 9, Consolidated Guidance About Materials Licenses, and that you include the following additional information:

- Diagrams of the "as-installed" shielding, including the materials and widths of all walls, the ceilings, the floor, and the door. Also indicate whether there are any penetrations in the shielding, and if so, describe how these areas are adequately shielded;
- Actual shielding calculations including assumptions;
- A reduction in the request for 13,000 Ci to 9,900 curies of Co-60;
- Detailed procedures required by 35.610;
- Detailed procedures required by 35.645;
- A commitment to conduct annual training and drills on emergency response;
- A more detailed description of emergency equipment;
- A more detailed description of source security and access controls including control of the console keys;
- A brief outline of the qualified vendor training program, including content and duration, that will be provided to the Authorized Users and Authorized Medical Physicists;
- Training certificates for the Authorized User and Authorized Medical Physicist from a qualified vendor;
- A description of the training provided to the Radiation Safety Officer; and a
- Description of the area radiation monitor that will be used.

If you should encounter any significant delays in your schedule that would prevent you from submitting a complete application (e.g., receipt of training, procedure development, facility

construction, etc.) and these delays could potentially impact your schedule for receipt of sources, then you have the option of amending your license in a two-phased approach. You could initially request a “possession-only” type license that would authorize only receipt and possession of the sources. Then, after you assemble sufficient information for a complete application, you can submit a license amendment request to authorize full clinical use. If you choose to initially request authorization to only receive and possess the sources, you will still need to provide NRC sufficient details regarding the following:

- 1) A detailed description of the sources to be received, including the sources, activities, and the qualified vendor supplying and installing the sources.
- 2) Records to demonstrate that appropriate engineering reviews have been performed and facilities are adequate to support required floor loading for receipt and storage;
- 3) Records to demonstrate that adequate shielding evaluations have been performed, and sufficient shielding is in place to comply with 10 CFR 20.1201 (Occupational dose limits), 10 CFR 20.1301 (Dose limits for individual members of the public), 10 CFR 20.1302 (compliance with the dose limits for individual members of the public), and that radiation doses will be maintained as low as is reasonably achievable.
- 4) A description of facility security and controls of licensed materials to provide reasonable assurance that access to licensed material received and stored is secured from unauthorized access and removal.
- 5) A commitment by the Radiation Safety Officer (RSO) to include the material into the hospital’s existing radiation safety program including use of appropriate radiological postings, access controls, and routine radiological surveys, etc.
- 6) The qualified individual (e.g., RSO) who will be responsible for ensuring that public dose limits and security controls are met.

If you have any questions regarding this matter, please contact Randolph C. Ragland, Jr. at 610-337-5083.

Sincerely,

Original signed by Sandra Gabriel

Sandra Gabriel
Senior Health Physicist
Medical Branch
Division of Nuclear Materials Safety

cc:
Leonard Shabason, Ph.D., Radiation Safety Officer

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