



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

F A C S I M I L E



**Name:** Jody Polley  
**Organization:** Gritman Medical Center License No. 11-27337-01  
Docket No. 030-32281  
Control No. 470715

**Fax:** 208-883-6464  
**Phone:** 208-883-2228  
**From:** Jacqueline D. Cook  
**Date:** October 13, 2005  
**Subject:** License Amendment Request dated September 23, 2005  
**Pages:** 2

Ms. Polley:

Per your letter dated September 23, 2005, signed by Mr. Milt Webber, the items on the next page are deficiencies which require your response. Please respond to this fax no later than close of business Wednesday, October 19, 2005. Our fax number is (817) 860-8263. If you have any questions regarding this fax, please call me at 817-860-8132. When responding to this fax, please include the license, docket and control numbers located at the top of this page.

Thank you for your cooperation and assistance in expediting this matter.

*/RA/*  
Jacqueline D. Cook  
Senior Health Physicist

1. Please put the letter requesting an amendment to your license on Gritman Medical Center's letterhead.
- 2.

7. A. Please commit to the following:

We will develop, implement, and maintain emergency procedures, in accordance with our radiation protection program required by 10 CFR 20.1101;

We will develop and implement procedures that include emergency response regarding an accident scenario. This plan will be readily available to both transport vehicle personnel and headquarters emergency-response contacts.

The plan should include the following:

- i. A 24-hours emergency contact telephone number for the mobile medical service provider's emergency response personnel;
- ii. The emergency contact numbers for NRC's Operation Center and all appropriate state radiological protection agencies;
- iii. Procedures for restricting access to the transport vehicle until surveys have been made to determine if any radiological hazards exist;
- iv. Procedures for retrieving and securing any byproduct material, including a sealed source that may become detached and/or dislodged to the extent that a radiological hazard is created, which may require one or more emergency shielded source containers;
- v. Preplanned decontamination procedures, including ready access to all necessary materials;
- vi. A calibrated, operational survey meter maintained in the cab of the transporting vehicle, which may be used at an accident scene for conducting surveys; and
- vii. Security of the transport vehicle against unauthorized access, including the driver's compartments.

Please note that an accident is defined as a vehicle collision or other event, such as wind, water or fire that results in damage to exterior or interior portions of the vehicle or the byproduct material used in the mobile medical service.

In addition, please note that the transportation emergency response plan should cover both actions to be taken by the mobile medical service provider's headquarters emergency response personnel and the "on-scene" hazardous material-trained personnel.

Also, please note that the type of response should be consistent with the level of the incident. The response may range from phone contact for minor spills to prompt on-site response (less than 3 hours) to event such as medical event or lost radioactive material.

- B. Please indicate typical response times of the RSO and AU in the event of an incident.
8. Please develop, document, and implement procedures to assure that the following takes place:
- A. Radioactive material is transported in accordance with 49 CFR Parts 170-189. Procedures will include:
    - , Use of approved packages;
    - , Use of approved labeling;
    - , Conduct of proper surveys;
    - , Complete and accurate shipping papers;
    - , Bracing of packages;
    - , Security provisions; and
    - , Written emergency instructions.
  - B. Management (or management's designee) will perform audits, at least annually, of transportation documentation (e.g., shipping papers and survey reports) and activities at client facilities.
  - C. Licensed material is secured during transport and use at the client's facilities.
  - D. Radioactive waste is handled properly during transport. Please describe the method of storage and final disposal.
  - E. The transport vehicle, including the driver's compartment, if separate, will be secured at all times from any unauthorized access when the vehicle is unattended.