From: Richard McKinley
To: Marissa.hernandez@ahsys.org
Date: 1/9/06 8:42AM
Subject: Morristown Memorial Hospital Amendment request

License No.:29-05139-03
Docket No:03002482
Control No: 137977

Dear Marissa:

It is our policy to update emergency response and spot check procedures when we do licensing actions subsequent to the new Part 35. Therefore, I need to ask you the following questions:

1. 10 CFR 35.12(b)(2) requires that licensees submit procedures for periodic spot-checks for remote afterloader units. Please provide your detailed spot-check procedures to be performed before the first use of the unit on a given day and after each source installation to assure proper operation of the following:

a. electrical interlocks at each remote afterloader unit room entrance;

b. source exposure indicator lights on the remote afterloader unit, on the control console, and in the facility;

c. viewing and intercom systems ;

d. emergency response equipment;

e. radiation monitors used to indicate the source position;

f. timer accuracy;

g. clock (date and time) in the unit's computer; and

h. decayed source(s) activity in the unit's computer.

In addition, please confirm that if spot-check results indicate the malfunction of any system, you will 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.

2. 10 CFR 35.610 requires that licensees develop written safety procedures for emergency response for remote afterloader units. The actions specified for emergency response should give primary consideration to minimizing exposure to the patient and healthcare personnel while maximizing patient safety. Please submit written safety procedures that you will implement for emergency response for your remote afterloader unit(s) including:

a. the circumstances when emergency procedures are to be implemented (i.e., when the source cannot be returned to a fully shielded position with controls from outside the room, source decoupling, jammed source, or console indicates source is not retracted ;

b. step-by-step instructions/actions for responding to single and/or multiple equipment failures and the individual(s) responsible for implementing each action. Clearly specify which steps are to be taken under different scenarios (i.e., exposed source versus a detached source);

c. the process for restricting access to and posting of the treatment area to minimize the risk of inadvertent exposure; and

d. the names and telephone numbers of authorized users, authorized medical physicists, and the Radiation Safety Officer to be contacted if the unit or console operates abnormally.

In addition, 10 CFR 35.610 requires, in part, that all device operators, authorized medical physicists, and authorized users participate in drills of the emergency procedures, initially and at least annually.

3. Please confirm that, per your email of January 5, 2006, you do not at this time need 35.300 authorization for Dr. El-Gabry.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.
If you have any questions about the above, please call me at (610)337-5102.

Sincerely,
Richard McKinley
Health Physicist
US NRC, Region I