

From: Sandra Gabriel
To: rforrest@ehrs.upenn.edu
Date: Fri, May 26, 2006 9:08 PM
Subject: Additional information for NRC license amendment request, mail control 138696

Licensee: University of Pennsylvania
License No.: 37-00118-07
Docket No.: 03002939
Mail Control No.: 138696

To: Rob Forrest, RSO

Please provide the following additional information regarding the license amendment request dated April 5, 2006 to authorize use of your Nucletron remote afterloader (HDR) unit for research and development as defined in 10 CFR 30.4 including animal studies and clinical veterinary procedures. Please provide a signed reply within 30 days. You may fax your reply to my attention at 610-337-5269, referencing mail control 138696. You may wish to leave a voicemail or e-mail message to alert me when you send the fax.

Please send an e-mail to confirm receipt of this message.

1. Please confirm that all protocols for research and development, animal, and veterinary use of your HDR unit will be reviewed and approved by your Radiation Safety Committee according to the review of experimental protocols described in your letter dated January 9, 2004, as part of your license renewal.
2. Please either confirm that all research and development, animal, and veterinary use of your HDR unit will be performed in your current human use HDR facility or provide the criteria you will use to evaluate alternative facilities prior to use.
3. Your request stated that these uses will be conducted under the supervision of an authorized medical physicist (AMP) in the HDR facility. Please confirm that the AMP will be present in the HDR control area and immediately available to respond to an emergency during all research and development, animal, and veterinary use of your HDR unit.
4. Please confirm that all animals will be anesthetized or restrained during HDR use so that no human will be present in the HDR treatment room during source exposure.
5. Please confirm that all staff members involved in direct operation of the HDR unit during research and development, animal, and veterinary use will receive vendor or vendor-equivalent safety training prior to first use.
6. Please confirm that you will follow the HDR human use requirements of 10 CFR 35.604, 35.610, 35.615, and 35.643, except for those referencing "authorized user or physician under the supervision of an authorized user," during all research and development, animal, and veterinary use of your HDR unit, substituting "experimental sample or animal" in place of "patient or human research subject."

Thank you for your help. If you have any questions, you may e-mail me or call at 610-337-5182. Please note that I will be on vacation until June 5, 2006, however I will check e-mail while away.

Sandy Gabriel
Senior Health Physicist
Medical Branch
NRC Region I

Mail Envelope Properties (4477A690.5A3 : 8 : 27167)

Subject: Additional information for NRC license amendment request, mail control
138696
Creation Date: Fri, May 26, 2006 9:08 PM
From: Sandra Gabriel
Created By: SLG2@nrc.gov

Recipients
ehrs.upenn.edu
rforrest (rforrest@ehrs.upenn.edu)

Post Office

Route
ehrs.upenn.edu

Files	Size	Date & Time
MESSAGE	3965	Friday, May 26, 2006 9:08 PM

Options
Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard