



Environmental Health & Radiation Safety

June 5, 2006

Sandy Gabriel
U.S. Nuclear Regulatory Commission
Nuclear Materials Safety Branch I
475 Allendale Road
King Of Prussia, PA 19406

Dear Ms. Gabriel:

In response to your e-mail dated May 26, 2006 concerning our amendment application for NRC License 37-00118-07, the following information is provided:

- 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.**

We confirm that all protocols for research and development, animal, and veterinary use of our HDR unit will be reviewed and approved by our Radiation Safety Committee according to the review of experimental protocols described in our letter dated January 9, 2004, as part of our 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.**

We confirm that all research and development, animal, and veterinary use of our HDR unit will be performed in our current human use HDR facility.

- 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.**

We 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 our 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.**

We 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.**

We 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."**

We confirm that we 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 our HDR unit, substituting "experimental sample or animal" in place of "patient or human research subject."

If you need further information, please contact me at 215-898-2109.

Sincerely,



Robert D. Forrest, CHP
Radiation Safety Officer

06-00511 RF-dp