Pittsburgh Mercy Health System 1400 Locust Street Pittsburgh, PA 15219-5166

CERTIFIED MAIL RETURN RECEIPT REQUESTED

July 6, 2006

U.S. Nuclear Regulatory Commission Office of Nuclear Material Safety and Safeguards Document Control Desk Director Washington, DC 20555-0001

To Whom It May Concern:



The Mercy Hospital of Pittsburgh (License # 37-01321-02) is notifying the U.S. Nuclear Regulatory Commission via this report in accordance with 10 CFR 35.3067. On July 5, 2006 it was determined that a Cs-137 brachytherapy sealed source, manufactured by Medi Physics, Inc., model # CDCT1, serial # CY 389, revealed the presence of 0.003 uCi of removable contamination at a photopeak identified as Cs-137. The full spectrum counts noted an activity of 0.006 uCi of removable contamination. These measured amounts either approached or slightly exceeded the identified contamination limit of 0.005 uCi. Subsequent leak tests identified reduced contamination.

Mercy Hospital immediately withdrew the source from use. The source has been segregated, shielded and secured to prevent any further use of the source. Medi Physics, Inc. will be contacted and we will request that they accept return of the source. In the event that the manufacturer refuses to accept the return of the source it will be transferred to a licensed disposal company. Copies of the leak test evaluations and the source calibration certificate are attached for reference.

If you need further information, please me at 412-232-8130 or David Wonderly, Medical Physicist, at 412-232-7352.

Sincerely. Sonner.

Barbara Bookser, B.S., CNMT Radiation Safety Officer

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Cc: U.S. Nuclear Regulatory Commission, Region I, Nuclear Material Section B

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Mercy Hospital of Pittsburgh

Department of Nuclear Medicine Captus 2000 s/n=cnv-063

WIPE TEST ANALYSIS

Page: 1

Jul 5, 2006 17:25:44

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Wipe Location: Cs-137 SN CY389 7/3/06 1st wipe Trigger Level: 22000 dpm Count Time: 60 seconds

Energy (keV)	Net Counts (cpm)	Region of (min)	Interest (max)	Isotope	Activity (µCi)
32.5	336.0	11	22	I125	
192.0	224.0	· 86	110		
660.5	1.492 k	309	352	Cs137	Y0:003
	the second s	درا به پیدیش جارا تحمد مارد			

Full Spectrum Total Counts (cpm) = 4.065 k Full Spectrum Net Counts (cpm) = 3.316 k at Efficiency of 24.10 % Gives Activity of 0.006 (pCi);

Full Spectrum Background Counts (cpm) = 749.0

** Indicates Trigger Level Exceeded

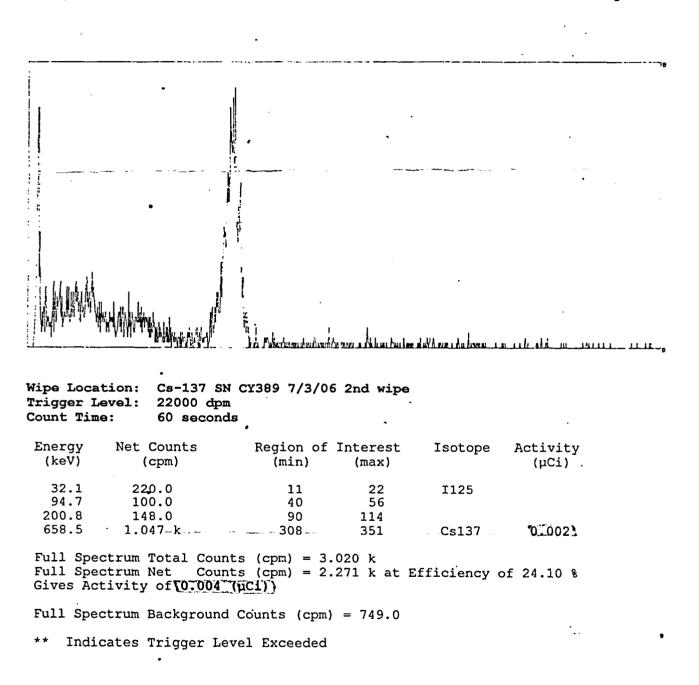
Mercy Hospital of Pittsburgh Department of Nuclear Medicine

Captus 2000 s/n=cnv-063

WIPE TEST ANALYSIS

Jul 5, 2006 17:27:42

Page: 1

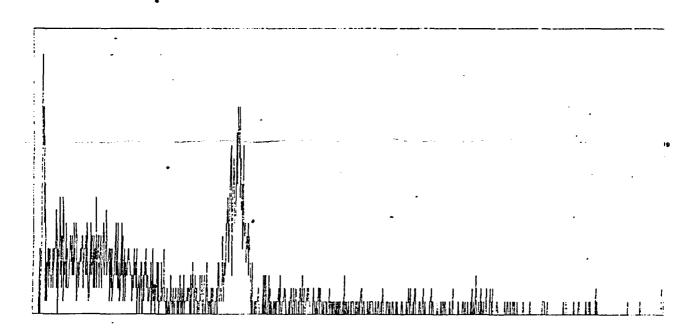


Mercy Hospital of Pittsburgh Department of Nuclear Medicine Captus 2000 s/n=cnv-063

WIPE TEST ANALYSIS

Jul 5, 2006 17:29:32

Page: 1



Wipe Location: Cs-137 SN CY389 7/5/06 3rd wipe Trigger Level: 22000 dpm Count Time: 60 seconds

Energy	Net Counts	Region of In	nterest	Isotope	Activity
(keV)	(cpm)	(min)	(max)		(µCi)
32.7	83.00	11	22	I125	D.001
658.6	312.0	308	351	Cs137	

Full Spectrum Total Counts (cpm) = 1.483 k Full Spectrum Net Counts (cpm) = 734.0 at Efficiency of 24.10 % Gives Activity of 0.001 (ncts)

Full Spectrum Background Counts (cpm) = 749.0

** Indicates Trigger Level Exceeded

Sealed Radioactive Source Test Report

Model No.: , CDCT1 Product Code No.: C	DCS J2	Radioisotope:	Cs-137 (Please refer	Nominal activity: to notes below)
Description: Tube Sou			Capsule:	· XN241/XN242
ANSI Classification C	64344		Spe	cial Form Certificate No.:

None

Classifications are based on the testing of specimen sources and give the levels expected from production sources. Recommended working life: See other side for evolution

See other side for explanation

Source Serial		Measurement AKR		Leakage test	Contamination test		
numt	per	$ \begin{array}{c} \mu Gy \text{ per hr} \\ \text{at 1 m} \\ \gamma \beta 2 \end{array} $	date	type L	type D	type A	
1		71		See other side for description of tests			
		4		date passed	date passed	date passed	
CY	326	78.3 76.98	27 Oct 92	09 Nov 92	09 Nov 92	12 Oct 94	
CY	380	82.2 81,06	14 Dec 92	27 Jan 93	27 Jan 93	12 Oct 94	
≻ CY :	389	82.3 81.06	14 Dec 92	27 Jan 93	27 Jan 93	12 Oct 94	
CY	394	77.9 76.57	14 Dec 92	27 Jan 93	27 Jan 93	12 Oct 94	
CY .	847	78.9	22 Jul 93	13 Aug 93	13 Aug 93	12 Oct 94	
CY	850	78.8	22 Jul 93 -	13 Aug 93	13 Aug 93	12 Oct 94	
CY	851	79.4	22 Jul 93	13. Aug 93	13 Aug 93	12 Oct 94	
CY	853	79.3	22 Jul 93	13 Aug 93	13 Aug 93	12 Oct 94	

Notes Batch No. None

Medi-Physics, Inc. does not report Nominal Activity for medical gamma-emitting sources. Nominal values could lead to misleading dosimetric results when these sources are used clinically. To convert AKR values to equivalent millicurie activity of Cs-137, multiply the AKR value by 0.347. To convert AKR values to mg Ra eq, multiply the AKR value by 0.138.

AEA Tachnology 888 272 2242 Customer's Order No.: 50513

Customer: Mercy Hospital

Internal Order No.:

11069 TR 742 Signed

Date: 13 Oct 94 -

Medi Physics, Inc., 2636 S. Clearbrook Drive Arlington Heights, Illinois 60005 Client Services: 1-800-MEDI-123 (1-800-633-4123) In Canada call: 1-416-847-1166 / 1-800-387-7160 (Ont/Que) 1-800-387-7146 (rest of Canada)

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Quality control .

Testing for leakage and containination

Stringent tests for leakage are an essential feature of Stringent tests for leakage are an essential Texture of redioactive sources prodiction. The methods adopted depend on the design and listended application of the source, and also on statutory requirements. Where necessary, tests can be specially modified to meet particular requirements.

The standard methods used for testing radiation sources are listed below.

Wipe test A

The source is wheed with a sweb or tissue, moistened with ethanol or water; the activity removed is measured. Limit: 185 Bq, 0.005 μ Ci.

Wipe test B

The source is wiped with a swab or tissue, moistened with ethano! or water; the activity removed is measured. Limit: 1.85 kBq, 0.05 µCl.

Bubble test D

The source is immersed in a suitable liquid (ethanediol) and the pressure in the vessel reduced to 100 mm of mercury. No bubbles must be observed.

Immersion test F

The source is immersed in water at 50 °C for 8 hours _ _ _ and the activity in the water measured. Limit: 1.85 kBq, 0.05 μCL

Immension test L

The source is immersed in water at 50 °C for 4 hours and the activity in the water measured. Limit: 185 Bq. 0.005 $\mu Cl.$

rsion test M

The source is immersed in water which is raised to 100 °C and held at that temperature for 10 min. The water is then removed, the source cooled, and the procedure repeated twice. Sources are passed if the activity extracted in the final procedure does not exceed 125 Bq, 0.005 μ Cl.

Helium mass spectograph test H

Limit: leak rate of 10-8 standard cm3/sec.

Emanation test K

(scintillation counting test for recon) The appliance is immersed in a solution of a phosphor in an organic liquid under vacuum; the leakage of radon is messured by liquid scintilizion counting. (DWIGHT, DJ. Radiochemical Centre Report R. 176). The limit corresponds to about 1.85 Bq, 5 x 10-11 Cl ne 216 hours per 24 hours.

IAEA Special Form

Special Form' is a test specification for sealed sources given in the IAEA transport regulations. (IAEA Safety Series No. 6, 1967/1973 revised editiont).

The required tests are:

increating test impact test percussion test bending test (only for long, slender sources) heat test

After each test the source must be subjected to leak testing.

Source working life

The 'recommended working life' is our recommendation of the period within which the source should be replaced. The period given has been assessed on the basis of such factors as, toxicity of nuclide, total initial activity, source construction (eg capsule design, source insert type, etc.), half-life of nuclide, typical spolic sciences, constructional experiment application environments, operational experience, test performance data, etc.

Adverse environments could affect the appearance and integrity of a source, it is the user's responsibility to regularly inspect and test the source in order to assess at what point during the "recommended working life" the source should be replaced.

ANSI Classification

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American National Standards Institute has proposed a system of classification of sealed radioactive sources based of safety requirements for typical uses (See ANSI N542–1977).

"This system provides a manufacturer of sealed radioactive sources with a set of tests to evaluate the safety of his products under working conditions. It also assists a user of such sealed sources to select types which suit the application he has in mind, especially where protection against the release of radioactive material is concerned."

Table 1. Classification of sealed source performance standa

The tests to which specimen sources are subjected are listed in Table 1.

Each tert can be applied in saveral degrees of saverity. Test results are expressed as a five figure code to Indicate the severity of the tests.

These figures are preceded by the latter C or E to I need induces are precision by the latter C or E to show whether the source activity is less than or greater than certain limits. These limits depend upon the toxicity, solubility and reactivity of the active component of the source.

C indicates that the activity level of the source does not exceed the prescribed limit and E that the limit is exceeded.

		Class					
Test	1	2	3	4	5	6	x
Temperature	No Test	-40 °C (20 min) +80 °C (1 hr)	-40 °C (20 min) + 180 °C (1 hr)	-40 °C (20 min) • 400 °C (1 kr) and thermal shock * 400 °C to 20 °C	-49°°C (20 min) +600 °C (1 hr) and thermal shock 500 °C	-40 °C (20 min) + 800 °C (1 hr) thermal shock 800 °C to 20 °C	Special Test
External pressure	No Test	25 kN/m ³ abs. (3.6 lb/in ³) to atmosphere	25 kN/m ³ abs. to 2 MN/m ³ (290 lb/in ³) abs.	25 kN/m ² abs. to 7 MN/m ³ (1 015 lb/ in ²) abs.	25 kN/m ³ abs, to 70 MN/m ³ (10 153 lb/ in ²).abs,	25 kN/m ³ abs. to 70 MN/m ³ (24 656 lb/ in ³) abs.	So4cia Test
Impact	No Test	50 g (1.8 oz) from 1 m (3.28 ft) and free drop ten times to a steel surface from 1.5 m (4.92 ft)	200 g (7 oz) from 1 m 5	2 kg (4,4 ib) from 1 m 5:	5 kg (11 lb) from 1 m	20 kg (44 ib) from 1 m	Specia Test
Vibration *	No Test	30 min 25 to 50° Hz at 5 g p. ek amp.	30 mm 25 to 50 Hz at 5 g pask amp. and 50 to 90 Hz at 0.635 mm amp. pask to pask and 90 to 500 Hz at 10 g	90 min 25 to 80 Hz at 1.5 mm amp, peak to peak and 80 to 2000 Hz at 20 g	Not Used	Not Used	Soecial Test
Puncture	No Test	1 g (15.4 gr) from 1 m (3.28 ft)	10 g (154 gr) from 1 m	50 g (1,76 oz) from 1 m	300 g (10.6 oz) from 1 m	1 kg (2.2 lb) from 1 m	Specia Test

Notes to Table 1.

Details of the testing procedures are given in ANSI N 542. A further class X can be used where a special test procedure has been adopted.

3. Impact test The source, positioned on a steel anvil, is struck by a steel hermor of the required weight, the hermor has a file striking surface, 25 mm diam,

with the edges rounded.

2. External pressure 100 kN/m² = 1 atmosphere (approx.)

4. Puncture test The source, positioned on a hardened steel envil, Is struck by a hardened pin, 6 mm long, 3 mm diam., with hemispherical end, fixed to a harmer the induction of the state.

Performance requirements for

Typical applications in which sealed radioactive sources may be used, with minimum performance are also given in ANSI N542. (see Table 2 below). These recommendations take into account norn reasonable accidental risks, but do not include exposure to the risk of fire, explosion or corrosion. rmance requirements int normal usage and

nts for typical uses. Table 2, Sealed source performance require

Contarl	-	1100

Sealed source use	Seeled pource test and class					
· · · · · · · · · · · · · · · · · · ·		Temperature	Pressure	Impact	Vibration	Puncture
Industrial radiography	Unprotected source Source in device	4	3	5 3	1	5 3
Gemme gauges (mitidium and high energy)	Unprotected source Source in device	4	3 3	3 2	3 3	32
Beta gauges and sources for low energy gar or X-ray fluorescence analysis (excluding g		3	3	2	2	2.
Oil well logging		5	6	5	2	2
Portable moisture and density gauges (incle or doily transported)	4	3	3	3	3	
General neutron source application (exclud	Sing reactor start-up)	4	3	3	2	3
Calibration sources, activity greater than 1.1	1 MBq, 30 µCi	2	2	3	1	2
Gamma irredistion sources	Unprotected source Source in device	4	3	4	2 2	4
Icn generators (source-device combination may be tested)	Chrometography Static eliminators Smuke detectors	3 2 3	222	222	1 2 2	1 2 2
Beta tele Interstit	teletherapy therapy ial and intracavitary	3 5 5 5 5	2 3 3 3	3 5 3 2	1 2 2 1	2 4 2 1
	ances" applicators	4	3	3	1	2

*Sources of this nature may be subject to severe deformation in use. Manufacturers and users may wish to formulate additional or special test procedures.

If the sealed source has a "C" classification, Table 2 can be used directly to assess the suitability of the source for the proposed application provided that there is no significant fire, explosion or corrosion hazard. If such a hazard does exist, the user and the manufacturer have to consider the following factors to determine whether additional testing is required:

- 1. consequences of loss of activity, 2. quantity of active meterial contained in the source, 3. radiotoxicity,
- 4. chemical and physical form of the material and the geometrical shape, 5, environment in which it is to be used,
- 6, protection afforded to the source or source-device mbination.

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Laboratory applications

The ANSI classification system does not refer explicitly to sources designed for research laboratory usage because of the wide variety of applications and environments in which such sources might be used.

If the sealed source has an 'E' classification, Table 2 cannot be used directly.

To determine whether any additional testing is necessary, an evaluation of the fire, explosion and corrosion hazards must first be made and a separate evaluation of the use and design of the source.

Some of our source designs exceed the recommendations of Table 2 and may therefore be acceptable for the applications listed despite the 'E' classification,

Special applications

No test program can cover all possible combinations of environments to which a source may be exposed.

Users should therefore consult our technical staff before using sources in potentially adverse environments.

	of the required weight.
or typical uses	
ctive sources may be us below), These recomme	ed, with minimum perfor Indations take into account