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July 31, 2006

U.S. Nuclear Regulatory Commission, Region I 475 Allendale Road King of Prussia, PA 19406-1415

Re:

Cardinal Health Nuclear Pharmacy Services, NRC Radioactive Materials License

Number 34-31064-01MD.

03036977

Attention Licensing:

Please amend the above referenced license(s) to revise the frequency required for required bioassay for handlers of I-131. This change only affects the frequency of bioassay for I-131, and not I-123, and more accurately mirrors the guidelines in NRC Regulatory Guide 8.20. Please see the attached Bioassay Program Proposed Revision.

If you have any questions, please contact me at 614.757.3116.

Sincerely,

Dave Breuning Health Physicist

Nuclear Pharmacy Services

CC:

PRSO, Loc 222, 223

License File Loc 222, 223 (3)

Encl: Bioassay Program Proposed Revision

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Bioassay Program Proposed Revision

Our current bioassay program states that the following individuals must perform a bioassay:

- a) All individuals that handle an open form of quantities of radioactive iodine greater than or equal to those quantities shown in Table 1 of NRC Regulatory Guide 8.20 (see Appendix C for a copy)
- b) Any employee sufficiently close to the handling process (within a few meters, and in the same room as the worker handling the material).

The bioassays should be performed at this frequency:

- a) Individuals compounding I-131 capsules must perform bioassays weekly and individuals compounding I-123 must perform bioassays between 6 and 24 hours post-handling.
- b) Individuals who are not on a regular bioassay program, but have assisted in decontamination, for example after a spill, shall complete a bioassay between 6 and 24 hours post-exposure.

Upon review of NRC Regulatory Guide 8.20 we have determined that the bioassay frequency schedule can be modified. The proposed changes are as follows:

Individuals whom handle I-131 will be divided into two categories, **frequent and infrequent** handlers. A frequent handler is defined as an individual whom handles I-131 or is sufficiently close to the handling process once every two (2) weeks or more often. An infrequent handler handles I-131 less frequently than, once every two (2) weeks.

Frequent handlers must follow the following bioassay schedule:

- a) Between 6-72 hours after initial handling of I-131, a bioassay must be performed.
- b) After the initial bioassay, a biweekly bioassay schedule will be maintained. A bioassay must be performed once every 2 weeks.
- c) After 3 months of the biweekly bioassay schedule an individual can change their bioassay schedule to monthly if they meet the following condition.
 - During the three month biweekly period, they do not exceed thyroid burden action level one for I-131 (0.04 µCi).
- d) If at some point during the monthly bioassay schedule an individual exceeds the thyroid burden action level one. They will revert to the biweekly schedule until three consecutive months have passed with a thyroid burden less than action level one.

Infrequent handlers must perform one bioassay with in 6-72 hours following handling I-131.

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This is to acknowledge	the receipt of your letter/application dated
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NRC FORM 532 (RI)	Sincerely,
(8-96)	Licensing Assistance Team Leader