

ACCEPTANCE REVIEW MEMO (ARM)

Licensee: Billings Clinic

License No.: 25-01051-01

Docket No.: 030-02389

Mail Control No.: 471076

Type of Action: Amend

Date of Requested Action: 08/9/2006

Reviewer Assigned: Torres

ARM reviewer(s): Torres

Response	Deficiencies Noted During Acceptance Review
N/A	1. [] Open ended possession limits. Submit inventory. Limit possession. [] Inform licensee that we are limiting possession limits. [] Ask the licensee if they have any type-amount of EAct Material.
	2.
	3.

Reviewer's Initials: _____

Date: _____

- ☐ Yes ☐ No Request for unrestricted use for Group 2 or higher category should be transferred by memo to FCDB within 10 days of receipt.
- ☐ Yes ☐ No Decommissioning notification should be completed within 30 days.
- ☐ Yes ☐ No Termination request < 90 days from date of expiration
- ☒ Yes ☐ No Expedite (medical emergency, no RSO, location of use/storage not on license, RAM in possession not on license, other)
- ☐ Yes ☐ No TAR needed to complete action.

Branch Chief's and/or Sr. HP's Initials: RJR

Date: 8/10/06

SUNSI Screening according to RIS 2005-31

☐ Yes ☒ No **Non-Publicly Available, Sensitive** if any item below is checked

General guidance:

- _____ RAM = or > than Category 3 (Table 1, RIS 2005-31), use Unity Rule
- _____ Exact location of RAM (whether = or > than Category 3 or not)
- _____ Design of structure and/or equipment (site specific)
- _____ Information on nearby facilities
- _____ Detailed design drawings and/or performance information
- _____ Emergency planning and/or fire protection systems

Specific guidance for medical, industrial and academic (above Category 3):

- _____ RAM quantities and inventory
- _____ Manufacturer's name and model number of sealed sources & devices
- _____ Site drawings with exact location of RAM, description of facility
- _____ RAM security program information (locks, alarms, etc.)
- _____ Emergency Plan specifics (routes to/from RAM, response to security events)
- _____ Vulnerability/security assessment/accident-safety analysis/risk assess
- _____ Mailing lists related to security response

Branch Chief's and/or Sr. HP's Initials: RJR

Date: 8/10/06

ML062220659

Pre-Licensing Screening

Applicant Information:

Control No. 471076

Name: Billings Clinic	Type of Request: Amend Program Code(s):
Location: Montana	License No.: 25-01051-01 Docket No.: 030-02389

STEP 1–Radioactive Materials and Quantities Requested:

Instructions for Step 1: Complete Step 1 for all applications. If all your responses in Step 1 are "No" then do not complete Step 2 (Screening Criteria). Sign and date the completed step-sheet and add it as the sensitive and non-publicly available OAR in ADAMS. If a "yes" response is indicated for any item in Step 1, also complete Step 2. If the type of use is subject to a Security Order or the requirements for increased controls, complete Step 3 (Item A or Item B) without delay.	Yes or No
A. The request is from a new applicant.	No
B. NUREG-1556, Volume 20, Section 4.9 indicates a licensing site visit is needed for the requested type of use, e.g., (1) Type A broad scope license, (2) panoramic irradiator containing > 10000 curies, (3) manufacturers or distributors using unsealed radioactive material or significant quantities of sealed material, (4) radioactive waste brokers, (5) radioactive waste incinerators, (6) commercial nuclear laundries, and (7) any other application that in the judgement of the reviewer and cognizant supervisor involves complex technical issues, complex safety questions, or unprecedented issues that warrant a site visit.	No
C. The applicant requested certain radionuclides and quantities that equal or exceed the Risk Significant Quantity (TBq) values in the table, below, that have been "highlighted" by the reviewer	No

Table of Risk Significant Quantities

(Category 2 Quantities, IAEA Safety Guide No. RS-G-1.9, Categorization of Radioactive Sources, August 2005)


Radionuclide	Risk Significant Quantity (TBq ¹)	Risk Significant Quantity (Ci ¹)	Radionuclide	Risk Significant Quantity (TBq ¹)	Risk Significant Quantity (Ci ¹)
Am-241	0.6	16	Pm-147	400	11,000
Am-241/Be	0.6	16	Pu-238	0.6	16
Cf-252	0.2	5.4	Pu-239/Be	0.6	16
Cm-244	0.5	14	Ra-226 ²	0.4	11
Co-60	0.3	8.1	Se-75	2	54
Cs-137	1	27	Sr-90 (Y-90)	10	270
Gd-153	10	270	Tm-170	200	5,400
Ir-192	0.8	22	Yb-169	3	81

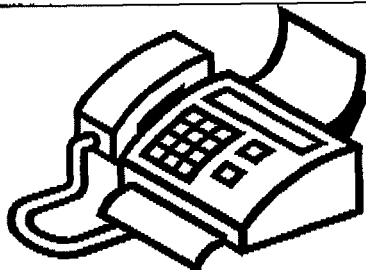
¹ The primary values are TBq. The curie (Ci) values are for informational purposes only.

² The Atomic Energy Act, as amended by the Energy Policy Act of 2005, authorizes NRC to regulate Ra-226 and NRC is in the process of amending its regulations for discrete sources of Ra-226.

Calculations of the Total Activity or the Unity Rule are attached to document whether or not the screening criteria in Step 2 were also completed to evaluate the application. NOTE–If an amendment of an existing license is being requested, the calculations will include the previously authorized quantities for the radionuclide(s).	Yes , No, or Not Applicable (NA)
Total Activity–multiple activities are requested for a single radionuclide and the sum of the activities equals or exceeds the quantity of concern for the radionuclide	NA
Unity Rule--multiple radionuclides are requested and the sum of the ratios equals or exceeds unity, e.g., [(total activity for radionuclide A) ÷ (risk significant quantity for radionuclide A)] + [(total activity for radionuclide B) ÷ (risk significant quantity for radionuclide B)] ≥ 1.0.	NA

Signature and Date for Step 1:

 8/10/06
 License Reviewer and Date



A facsimile from

Billings Clinic

Chris Fitz

To: Roberto Torres
Fax number: 817-860-8263

Date: 8/10/2006

Regarding: Amendment for Billings Clinic

Comments: Sorry my fax machine was not working yesterday. Thanks for your help

471076

August 9, 2006

Roberto J. Torres
Senior Health Physicist
U.S. Nuclear Regulatory Commission, Region IV
Division of Nuclear Materials Safety
Nuclear Materials Licensing Branch
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011
Telephone 817-860-8189

Re: Expedited Amendment Request for Billings Clinic License Number
25-01051-01, Billings, Montana.

030-02389

Mr. Torres,

We request to have our license amended to add an additional sealed source for 10 CFR 35.400 use (item 6D). We wish to add Oncura 6711 model 6711. The sealed source and device registry number is listed as either GE Healthcare model 6711 or Medipysics Model 6711. The authorized medical use for the I-125 seed is interstitial brachytherapy. Based upon the needs of the patient we need to perform the procedure on August 17, 2006. We are currently authorized for 1200 mCi for item 6D. We will not need to increase our possession limit for this use. I appreciate any assistance you can provide in providing an expedited review and authorization since we have began the treatment planning. If you require additional information please contact me at 406-672-6756.

Sincerely,



Christopher K. Fitz, J.D., M.S.
Radiation Safety Officer

Reviewer's notes:

Model 6711

IL-0136-S-338-S

471076

From: "Chris Fitz" <chrisfitz65@hotmail.com>
To: <RJT@nrc.gov>
Date: 08/09/2006 4:36:25 PM
Subject: Amendment Request for Billings Clinic License Number 25-01051-01

Good Afternoon Roberto,

Please find attached an amendment request for Billings Clinic. We need to add a different source for a lung implant. We need to try a different model for our I-125 seeds. I would appreciate your assistance with an expedited review based upon the need of the patient. Please note I believe this source is no distributed by Oncura and was previously listed as a GE healthcare and Medipysics model 6711.

Thanks for your help with this request. I have faxed a signed copy of the request to your attention at 817-860-8188.

Have a great day.

Chris Fitz, RSO Billings Clinic

August 9, 2006

Roberto J. Torres
Senior Health Physicist
U.S. Nuclear Regulatory Commission, Region IV
Division of Nuclear Materials Safety
Nuclear Materials Licensing Branch
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011
Telephone 817-860-8189

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Sincerely,

Christopher K. Fitz, J.D., M.S.
Radiation Safety Officer

Mail Envelope Properties (44DA553B.D74 : 2 : 44404)

Subject: Amendment Request for Billings Clinic License Number 25-01051-01
Creation Date 08/09/2006 4:35:24 PM
From: "Chris Fitz" <chrisfitz65@hotmail.com>
Created By: chrisfitz65@hotmail.com

Recipients

nrc.gov
 ARL_PO.ARL_DO
 RJT (Roberto Torres)

Post Office
 ARL_PO.ARL_DO

Route
 nrc.gov

Files	Size	Date & Time
MESSAGE	610	08/09/2006 4:35:24 PM
AmendmentforBillingsClinicI-125seed0806.doc		20992
Mime.822	31397	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
 This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
 Junk List is not enabled
 Junk Mail using personal address books is not enabled
 Block List is not enabled

