



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

September 22, 2006

Docket No. 03012998  
Control No. 139266

License No. 37-07438-15

Sreekant Murthy, Ph.D.  
Vice Provost for Research Compliance  
Philadelphia Health & Education Corp.  
d/b/a Drexel University College of Medicine  
245 North 15<sup>th</sup> Street  
Philadelphia, PA 19102-1192

**SUBJECT: PHILADELPHIA HEALTH & EDUCATION CORP., REQUEST FOR  
ADDITIONAL INFORMATION CONCERNING APPLICATION FOR  
AMENDMENT TO LICENSE, CONTROL NO. 139266**

Dear Dr. Murthy:

This is in reference to your letter dated August 7, 2006 requesting to amend Nuclear Regulatory Commission License No. 37-07438-15. In order to continue our review, we need the following additional information:

1. In your "Methods and Materials" section of the Final Status Survey Report, it did not appear that the appropriate amount of historical site assessment was performed to adequately differentiate impacted from non-impacted areas. The location at 3300 Henry Avenue Pennsylvania has been licensed for radioactive materials since June 21, 1961 and a visual inspection may not be adequate. Please consider additional techniques to identify areas of material use. Please review the guidance in NUREG-1575, MARSSIM, sections 3.4.1.2 Operating Records and 3.4.2 Contacts and Interviews. A copy of NUREG-1575 may be obtained electronically by using the following URL [www.epa.gov/radiation/marssim/obtain.htm](http://www.epa.gov/radiation/marssim/obtain.htm).
2. In your application dated December 15, 1976, the following areas were identified as proposed areas of material use: RIA Room B24/L; Microbiology Room G13/C; Pharmacology Lab Rooms 313C and 314C; and Rooms 12R, 15R, 16R, and 17R of Floor G. In a application dated June 19, 1973, materials were planned to be used in Room 31 and 32 of the animal quarters. Surveys were not performed for these locations in your Final Status Survey Report. Please submit surveys for these areas.
3. In your Final Status Survey Report, the close out survey for WMH Waste Room 1<sup>st</sup> floor, states that there are some materials remaining which is owned by the hospital. As the hospital is located at the same address, these materials need to be appropriately disposed before this location may be removed from the license.
4. For all sealed sources, including sources no longer in the licensee's possession, provide the most recent leak tests. For leak tests no longer required to be maintained, state if you have had any known leaking sealed sources.

5. Confirm that you will retain the decommissioning records as discussed in 10 CFR 30.35, 30.36, and 30.51, or affirm that you are not required to retain these records.
6. Please state how your radioactive material has been disposed. Please include details of any waste contractor or disposal site transfer, including date of transfer and recipient's license number. Written confirmation from the recipient of material that the material has been transferred to them should be attached.
7. In support of an environmental assessment related to the release of your facility:
  - a) Provide the name of the facility to be released.
  - b) Provide the size of the building(s) in square feet.
  - c) Describe the type of building(s) use such as "general office and laboratory"
  - d) Describe the surrounding area, such as "residential", "industrial", "commercial", "mixed residential/commercial", etc.
  - e) Describe the general type of activities authorized on the license, such as "laboratory procedures typically performed on bench tops and in hoods.
  - f) State when you ceased licensed activities.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Toolkit Index Page**. Or you may obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 139266. If you have any technical questions regarding this deficiency letter, please call Dennis Lawyer at (610) 337-5366.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Sincerely,

***Original signed by Thomas K. Thompson***

Thomas K. Thompson  
Senior Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety

S. Murthy  
Philadelphia Health & Education Corp.

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cc:  
Kent Lambert, Radiation Safety Officer

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**SUNSI Review Complete: DLawyer**

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| NAME   | DLawyer/DRL |                                       | TThompson/TKT |                            |         |                          |                          |
| DATE   | 09/22/2006  |                                       | 9/22/2006     |                            |         |                          |                          |

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