

Graduate Hospital



One Graduate Plaza
1800 Lombard Street
Philadelphia, PA 19146
tel: 215.893.2000

October 19, 2006

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

VIA FACSIMILE: 610-337-5393

re: License No. 37-28359-01
Control No. 139327

03031046

Br.1

RECEIVED
REGION I
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EXPEDITED REVIEW REQUESTED

Dear Mr. Lee:

Please add the following action to the amendment request referenced by the above control number:

Please amend the above referenced license to remove Dr. Siskind as the radiation safety officer and add Mr. Patrick T. Glennon, M.S., CHP, DABR. Mr. Glennon is the full-time therapy medical physicist at Graduate Hospital. Mr. Glennon served as the radiation safety officer for Hahnemann University (License No. 37-00467-34) in 1992 (see attached). Mr. Glennon, therefore, meets the criteria in §§35.57(a)(1).

Patrick Glennon has been a diplomat of the American Board of Health Physics in comprehensive health physics since 1983. As a certified health physicist, Mr. Glennon is required to demonstrate continuing education to recertify every 4 years. The attached log of continuing education activities are provided for your reference. Based on these, Mr. Glennon meets the criteria in §§35.59.

Mr. Glennon served as the authorized medical physicist for intravascular brachytherapy on the above referenced license in 2005. He also serves on the hospital's radiation safety committee.

If you have any questions or if you need any additional information, please feel free to contact me.

Sincerely,

Tammy Torres
Chief Operating Officer

Encl (4)

cc: Patrick Glennon, M.S., CHP, DABR
Kent Lambert, M.S., CHP

139574
NRC/RCN MATERIALS-002

Graduate Hospital



One Graduate Plaza
1800 Lombard Street
Philadelphia, PA 19146
tel: 215.893.2501
fax: 215.893.2302

Brian Finestein
Chief Executive Officer

Date: October 20, 2006
To: Patrick Glennon, M.S., CHP, DABR
Cc: Affected department heads
From: Tammy Torres, COO
Re: Delegation of Authority

You, Patrick Glennon, M.S., CHP, DABR, have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the radiation protection program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations.

You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations where justified by radiation safety. You are required to notify management if staff do not cooperate and do not address radiation safety issues. In addition, you are free to raise issues with the Nuclear Regulatory Commission at any time.

I accept the above responsibilities.

P Glennon
Patrick Glennon, M.S., DABR
Radiation Safety Officer

Tammy Torres
Tammy Torres
Chief Operating Officer

10/20/06
Date

10/20/06
Date

Graduate Hospital

TENET

One Graduate Plaza
1800 Lombard Street
Philadelphia, PA 19146
tel: 215.893.2000

October 20, 2006

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

RE: NRC License No. 37-28359-01
RSO Agreement

Dear Sir or Madam:

I am familiar with 10 CFR Part 35 and I understand the duties of the Radiation Safety Officer. I understand that as Radiation Safety Officer, I am responsible for implementing the radiation protection program. I have the time to fulfill this responsibility and agree to do so.

Sincerely,



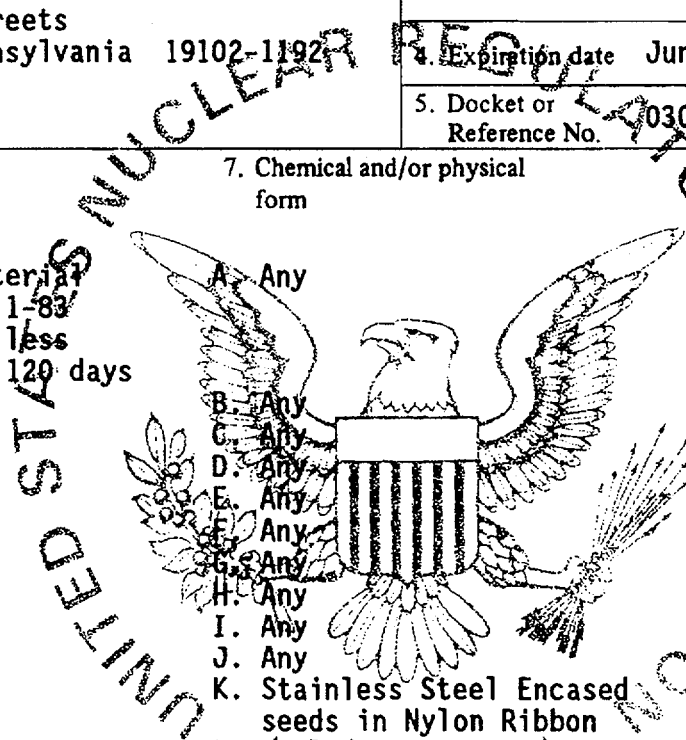
Patrick Glennon, M.S., CHP, DABR

MATERIALS LICENSE

Amendment No. 23

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 39, 40 and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee		In accordance with letter dated March 18, 1992,	
1. Hahnemann University Department of Environmental Safety, MS 641		3. License number 37-00467-34 is amended in its entirety to read as follows:	
2. Broad and Vine Streets Philadelphia, Pennsylvania 19102-1192		4. Expiration date June 30, 1992	
		5. Docket or Reference No. 030-02959	
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license	
A. Any byproduct material with Atomic Nos. 1-83 with a half-life less than or equal to 120 days	A. Any	A. 100 millicuries each radionuclide with with a total possession limit of 2 curies	
B. Carbon 14	B. Any	B. 25 millicuries	
C. Hydrogen 3	C. Any	C. 400 millicuries	
D. Phosphorus 32	D. Any	D. 500 millicuries	
E. Iodine 131	E. Any	E. 750 millicuries	
F. Technetium 99m	F. Any	F. 10 curies	
G. Gold 198	G. Any	G. 500 millicuries	
H. Sulfur 35	H. Any	H. 500 millicuries	
I. Iodine 125	I. Any	I. 500 millicuries	
J. Chromium 51	J. Any	J. 500 millicuries	
K. Iridium 192	K. Stainless Steel Encased seeds in Nylon Ribbon	K. 2 curies	
L. Strontium 90	L. Sealed Source (Tracerlab Model RA-1)	L. 50 millicuries	
M. Iodine 125	M. Seeds	M. 5 curies	
N. Molybdenum 99	N. Molybdenum 99/ Technetium 99m Generators	N. 10 curies	
O. Cesium 137	O. Sealed sources (needles and cells)	O. 2 curies	
P. Calcium 45	P. Any	P. 3.5 millicuries	
Q. Strontium 90	Q. Sealed Sources for Gas Chromatography	Q. 200 millicuries	
R. Nickel 63	R. Plated sources or foils	R. Not to exceed 20 milli- curies per foil and 200 millicuries total	



**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License number

37-00467-34

Docket or Reference number

030-02959

Amendment No. 23

(6., 7., and 8. Continued)

6. Byproduct, source, and/or special nuclear material

7. Chemical and/or physical form

8. Maximum amount that licensee may possess at any one time under this license

S. Ruthenium 106/
Rhodium 106

S. Sealed source (Akademie der Wissenschaften der DDR Models CCA, CCB, COB, COC, COE, COZ, CGD, CIA, CIB OR CIB-2) eye applicators

S. Not to exceed 1 millicurie per applicator, with a total possession limit 20 millicuries

T. Palladium 103
U. Gadolinium 153

T. Seeds
U. Sealed source (Lunar GD Series)

T. 500 millicuries
Not to exceed 1.5 curies each, with a total possession limit of 3 curies

9. Authorized use

A. through P. Medical research, diagnosis, and therapy; research and development as defined in 10 CFR 30.14(d). Tracer studies in laboratory animals and instructional purposes.

Q. and R. For use in electron capture detectors in gas chromatographs which are distributed under a license issued by the Nuclear Regulatory Commission or an Agreement State.

S. and T. For use in the treatment of eye tumors.

U. For use in the Lunar Radiation Corporation Model DP3 bone mineral analyzer.

CONDITIONS

10. Locations of use:

A. Hahnemann Medical College and Hospital, 320 North Broad Street, Philadelphia, Pennsylvania.

B. Cobalt 60, Iodine 125 seeds, Iridium 192 seeds, Palladium-103 seeds, and Ruthenium 106/Rhodium 106 eye applicators may be used at the Wills Eye Hospital, 9th and Walnut Streets, Philadelphia, Pennsylvania.

11. Radiation Safety Officer: Patrick T. Glennon, M.S.

12. A. Licensed material shall be used by, or under the supervision of, individuals designated by licensee's Radiation Safety Committee, Luther W. Brady, M.D., Chairman.

B. The licensee's Radiation Safety Committee may permit a physician to use byproduct material for medical use, research, and development. The physician must meet the appropriate training and experience criteria in 10 CFR Part 35, Subpart J. The licensee's Radiation Safety Committee may make case-by-case exceptions to these criteria.

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License number

37-00467-34

Docket or Reference number

030-02959

Amendment No. 23

(Continued)

CONDITIONS

13. Experimental animals administered licensed materials or their products shall not be used for human consumption.
14. In lieu of using the conventional radiation caution colors (magenta or purple on yellow background) as provided in Section 20.203(a)(1), of 10 CFR Part 20, the licensee is hereby authorized to label detector cells and cell baths, containing licensed material and used in gas chromatography devices, with conspicuously etched or stamped radiation caution symbols without a color requirement.
15. Sealed sources or detector cells containing licensed material shall not be opened or sources removed from source holders or detector cells by the licensee.
16. The licensee shall not acquire licensed material in a sealed source or in a device that contains a sealed source unless the source or device has been registered with the Nuclear Regulatory Commission under 10 CFR 32.210 or with an Agreement State.
17. The licensee may transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material".
18. Pursuant to Sections 20.106(b) and 20.302 of 10 CFR Part 20, the licensee is authorized to dispose of licensed material by incineration provided the gaseous effluent from incineration does not exceed the limits specified for air in Appendix B, Table II, 10 CFR Part 20. Ash residues may be disposed of as ordinary waste provided appropriate surveys pursuant to Section 20.201 of 10 CFR Part 20 are made to determine that concentrations of licensed material appearing in the ash residues do not exceed the concentrations (in terms of microcuries per gram) specified for water in Appendix B, Table II, 10 CFR Part 20.
19. Pursuant to Section 20.105(a) of Title 10, Chapter I, Code of Federal Regulations, Part 20 "Standards for Protection Against Radiation," and in reliance of statements, procedures and representations made by the licensee in letters dated November 15, 1982 and February 16, 1983 the following maximum radiation levels are hereby authorized in the following unrestricted areas:

Maximum Radiation Level

450 millirems in any seven consecutive days - No individual to exceed 500 millirems per year

Unrestricted Area

Rooms and hallways adjoining brachytherapy patient rooms employing iridium 192 seeds

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License number

37-00467-34

Docket or Reference number

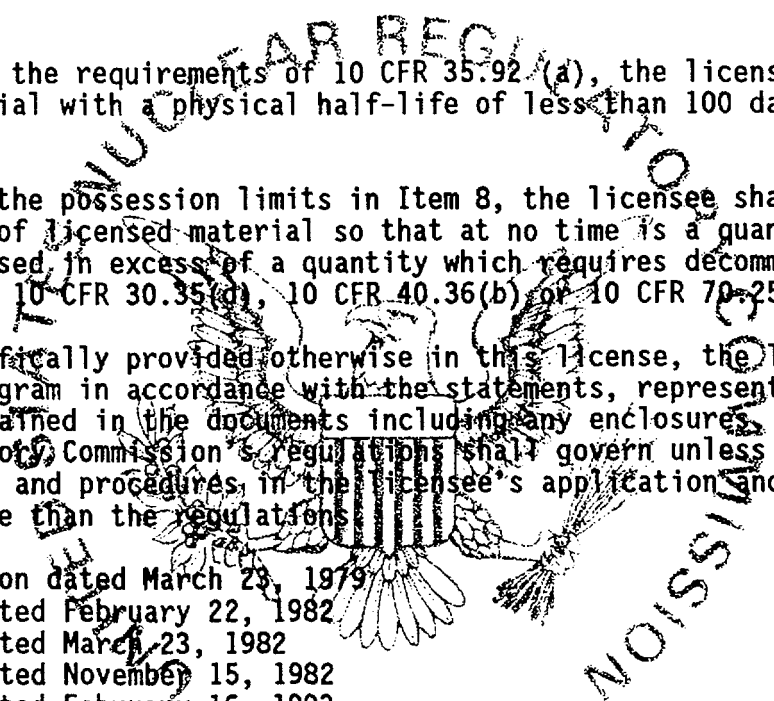
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Amendment No. 23

(Continued)

CONDITIONS

- 20. Survey meters shall be calibrated in accordance with the procedures set forth in Appendix D, Section 1 of Regulatory Guide 10.8: "Guide for the Preparation of locations for Medical Programs," January, 1979.
- 21. Notwithstanding the requirements of 10 CFR 35.49 (a) and (b), the licensee may use for medical use any byproduct material or reagent kit for which the Food and Drug Administration has accepted a "Notice of Claimed Investigational Exemption for a New Drug" (IND).
- 22. Notwithstanding the requirements of 10 CFR 35.92 (a), the licensee may hold byproduct material with a physical half-life of less than 100 days for decay-in-storage.
- 23. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material so that at no time is a quantity of radioactive material possessed in excess of a quantity which requires decommissioning funding in accordance with 10 CFR 30.35(d), 10 CFR 40.36(b) or 10 CFR 70.25(d).
- 24. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.
 - A. Application dated March 23, 1979
 - B. Letter dated February 22, 1982
 - C. Letter dated March 23, 1982
 - D. Letter dated November 15, 1982
 - E. Letter dated February 16, 1983
 - F. Letter dated October 28, 1983
 - G. Letter dated June 29, 1984
 - H. Letter dated September 6, 1984
 - I. Letter dated October 13, 1986
 - J. Application dated March 24, 1987
 - K. Letter dated July 1, 1987
 - L. Letter dated April 22, 1988
 - M. Letter dated March 30, 1989
 - N. Letter dated May 17, 1989
 - O. Letter dated December 11, 1989
 - P. Letter dated August 15, 1990
 - Q. Letter dated February 4, 1991
 - R. Letter dated June 21, 1991



For the U.S. Nuclear Regulatory Commission

Original Signed By:
Jenny Johansen

By

Nuclear Materials Safety Branch
Region I
King of Prussia, Pennsylvania 19406

Date MAY 29 1992

10. ABHP/CEP approved continuing education courses attended during current renewal period.

Sponsor	Course Title	Where Offered	Dates		CEP Approval Certificate No.	Continuing Edu. Credits
			From	To		
a. Memorial Sloan Kettering	5th International Symposium on 3D conformal therapy & brachytherapy	NYC	6/1/00	6/3/00	2000-06-025	10
b. US NRC	Part 35 workshop for External Stakeholders	King of Prussia PA	9/24/02		2002-09-002	4
c. Delaware Valley Chapter AAPM	HDR & Endovascular Therapy Symposium	Philadelphia, PA	12/7/01		2001-12-006	4
d. AAPM Remotely Directed Cont. Ed.	Fetal Dose From radiotherapy with proton beams	"	9/10/02		2002-acti-glenn	1
e. " "	Exposure Limitation to Ionizing Radiation	"	9/13/02		2002-acti-glenn	1
f. " "	Calculation of Effective Dose	"	9/12/02		2002-acti-glenn	1
g. MCP/Hahnemann Univ.	Brachytherapy Lecture	"	3/9/02		2002-pres-glenn	8
h. ABHP	Questionnaire	"	7/1/00		pre-approved	4
i. AAPM	Annual Meeting	San Diego, CA	8/11/03 - 8/14/03		"	12
j. AIHA local chapter	attended 2 meetings	New Brunswick NJ	10/16/03 11/20/03		"	4
k. AAPM/HPS	attended local chapter meetings	Philadelphia, PA	2/24/00 6/5/00 11/29/00	9/26/01 3/11/02 2/19/02	1/8/03 3/13/03 1/6/03	18
l. Gyned Meroy College	QA lecture	Gyned Valley PA	11/1/03		2003-pres-glenn	2
m.						
n.						
o.						

Total No. of Credits 69

NOTE: Do not submit application until a minimum of 64 continuing education credits have been earned within your current renewal period.

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