

## ACCEPTANCE REVIEW MEMO (ARM)

**Licensee:** Diagnostic Imaging Services of Idaho      **License No.:** 11-34221-01  
**Docket No.:** 030-36948      **Mail Control No.:** 471176  
**Type of Action:** Amend      **Date of Requested Action:** 10-26-06  
**Reviewer Assigned:**      **ARM reviewer(s):** Torres

*RITC*

Response	Deficiencies Noted During Acceptance Review
	[ ] Open ended possession limits. Limit possession. Submit inventory. [ ] Submit copies of most recent leak test results. [ ] Add - delete IC license condition. Add IC paragraph in cover letter. [ ] Split license from cover letter. Add SUNSI marking to license. [ ] Ask the licensee if they have any type-amount of EPAct Material.

**Reviewer's Initials:** \_\_\_\_\_ **Date:** \_\_\_\_\_

<input type="checkbox"/> Yes	<input type="checkbox"/> No	Unrestricted release Group 2 or >: Transfer memo to FCDB within 10 days.
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Decommissioning notification should be completed within 30 days.
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Termination request < 90 days from date of expiration
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Expedite (medical emergency, no RSO, location of use/storage not on license, RAM in possession not on license, other)
<input type="checkbox"/> Yes	<input type="checkbox"/> No	TAR needed to complete action.

**Branch Chief's and/or Sr. HP's Initials:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**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:** *RITC* **Date:** 11-26-06

## Pre-Licensing Screening

### Applicant Information:

Control No. 471176

Name: Diagnostic Imaging Services of Idaho	Type of Request: Amend Program Code(s):
Location: ID	License No.: 11-34221-01      Docket No.: 030-36948

### STEP 1—Radioactive Materials and Quantities Requested:

<b>Instructions for Step 1: Complete Step 1 for all applications.</b> 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) <sup>1</sup>	Risk Significant Quantity (Ci) <sup>1</sup>	Radionuclide	Risk Significant Quantity (TBq) <sup>1</sup>	Risk Significant Quantity (Ci) <sup>1</sup>
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 <sup>2</sup>	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

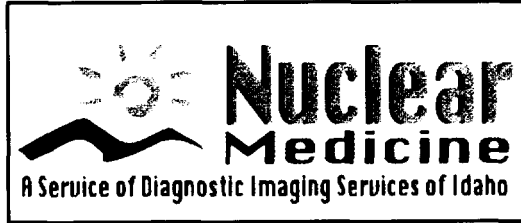
<sup>1</sup> The primary values are TBq. The curie (Ci) values are for informational purposes only.  
<sup>2</sup> The Atomic Energy Act, as amended by the Energy Policy Act of 2005, authorizes NRC to regulate Ra-226 and NRC is in the process of amending its regulations for discrete sources of Ra-226.

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. <b>NOTE—If an amendment of an existing license is being requested, the calculations will include the previously authorized quantities for the radionuclide(s).</b>	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	—
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.	—

### Signature and Date for Step 1:

JTC 11/22/06

License Reviewer and Date



RECEIVED

NOV 06 2006

DNMS

DATE: October 26, 2006

Jack Whitten  
United States Nuclear Regulatory Commission Region IV  
Nuclear Materials Licensing Branch  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

*WJC*

***Re-submission of letter dated September 5, 2006***

Re: License ---(11-34221-01)-----

Dear Mr. Whitten:

This is a request to amend our radioactive materials license to allow:

1. Administration of licensed radiopharmaceuticals to patients at temporary job sites (client facilities).
2. Allow delivery of license material directly to our coach when it is located at temporary job sites.

Concerning item 1: Administration in the client facility may occur when the patient's condition is such that transport to the coach, for administration only, will cause the patient pain or discomfort or interfere with medical care. In these cases, all materials that may be radiocontaminated will be returned to the coach for survey and proper disposal or decay-in-storage and this temporary administration area will be surveyed at the end of the day before the coach departs the location. Client facilities will have no designated equipment, receipt and use areas. In the event of radioactive spill, our radioactive spill procedure will be followed.


Additionally, Iodine-131 will not be administered in the client facilities.

Concerning item 2: Since our license was issued, a radiopharmacy has opened in Chubbuck, Idaho. This has allowed us to discontinue use and transport of a Tc-99m generator. Additionally, it will permit us to provide more timely service if we are allowed to receive material at our temporary job sites. We will develop and implement a procedure with the radiopharmacy to deliver material directly to, and only to, the coach

when it is staffed by Diagnostic Imaging Service of Idaho personnel. Materials will not be delivered to the client facility.

We appreciate your consideration of our requests. If you require additional information, please call.

Sincerely,



Jim Everson

Attachments:

1. Spill Procedure
2. Radiation Survey Procedure

# Radiation Surveys

## Radiation Survey Procedure

*The survey requirement for nuclear medicine has two parts; a limited daily survey, and a more extensive weekly survey for contamination and radiation exposure rates. The daily survey can be done with a sensitive survey meter and is intended to identify unusual radiation levels, sources, syringes, or vials left out, hot swabs or gloves in the trash, or any small spills. The weekly surveys document that the radiation protection measures are adequate.*

### Daily surveys

- Do them after doses have been prepared and administered (toward the end of the day, not in the morning). Before leaving a client's address, all areas of use must be surveyed.
- Survey surfaces in the preparation and administration areas with a sensitive radiation detection instrument, such as a pancake or thin end-window probe.
- Listen for unusual levels that may indicate an unshielded source or excessive surface contamination.
- Check the dose preparation and dosing areas in the department, the treadmill room if it was used, the hallway between the hot lab and the dosing areas, and the trashcans.

- ✦ **Client Facilities** If it is necessary to administer licensed material in the client facility, because the patient's condition is such that transport to the coach, for administration only, will cause the patient pain or discomfort or interfere with medical care, specific survey procedures will be followed:

In these cases, all materials that may be radiocontaminated (such as absorbent paper, syringes, needles, gloves, catheters, swabs, patient clothing), will be returned to the coach for survey and proper disposal or decay-in-storage. This temporary administration area will be surveyed at the end of the day before the coach departs the location. Client facilities will have no designated equipment, receipt and use areas.

**Note:** Iodine-131 may not be administered in client facilities.

Surveys will be clearly documented and the administration location will be noted on the patient dose log.

- The daily survey log should show
  - ✦ date,
  - ✦ instrument used,
  - ✦ background,

- ↳ results of the survey. If all readings were less than the action level, "negative" may be recorded.
- ↳ facility location, if administration is made within the client facility (i.e. patient's room #, emergency room, etc.)
- A conservative action level is 200 counts per minute over background.
- If the action level was exceeded, note the corrective action taken ("cleaned area", "took hot band aid out of trash").
- Log entries must be initialed.

### **Weekly exposure rate surveys (coach and home base)**

- Radiation level surveys should be done weekly in the nuclear medicine department and in radioactive waste storage areas.
- Be aware that your survey meter may be energy dependent. (see **Survey Meters** below)
- Radiation levels in unrestricted areas must not exceed 2 mR/hr, and should not exceed 0.25 mR/hr in continuously occupied spaces.
- Radiation levels in accessible areas of radioactive materials labs must not exceed 2 mR/hr except for very brief periods of time. In order to meet the ALARA program exposure limitation goals (500 millirem per year), the average dose rate in a radioactive material lab should not exceed 0.25 mR/hr (10 millirem per week). In most nuclear medicine departments, the patient is the most significant source of exposure. It is advisable to occasionally check exposure rates in the lab with patients present. Patients are your biggest source of exposure.



In order to meet the ALARA program exposure limitation goals (500 millirem per year), the average dose rate in a radioactive material lab should not exceed 0.25 mR/hr (10 millirem per week). In most nuclear medicine departments, the patient is the most significant source of exposure. It is advisable to occasionally check exposure rates in the lab with patients present. Patients are your biggest source of exposure.

Exposure rate limits and action levels are generally for whole body exposure – they apply to areas in which a major portion of a person's body could be exposed. It does not apply to small or inaccessible areas. The levels in unrestricted areas must not result in any member of the general public receiving more than 100 millirem in one year. Occupancy factors may be taken into account. Workers are not "members of the general public"

### **Weekly contamination survey (coach and home base)**

- Take wipe samples once a week on floors, counters, and other surfaces. Wipe samples should also be taken just outside the lab and waste storage areas to verify that contamination is not being spread into unrestricted areas.

- Wipe samples can be taken with small pieces of filter paper, paper towel or alcohol wipes.
- The wipe should be taken over 100 square centimeters, which is a square about 4 inches on a side. Wipe an S shape inside the square.
  - Count the wipe by holding it about 0.5 cm from the window of the pancake probe for at least 10 seconds and observing the meter.
  - A scintillation well detector can also be used to count wipe samples.
  - The suggested action level in unrestricted areas is 0.01 uCi on surfaces or per wipe sample.<sup>1</sup> The floor of the nuclear medicine department should be kept below the unrestricted area limits. Contamination levels on the bench tops in the nuclear medicine lab can be allowed to reach 0.1 nCi per wipe (or 10000 cpm) as long as the area is clearly identified as a radioactive material area.



*Surface contamination does not represent a significant health hazard even at levels very much higher than the action level. Stray contamination does indicate a lack of attention to good practice and may have negative public relations and employee relations consequences.*

#### References

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<sup>1</sup> Siegel JA. Guide For Diagnostic Nuclear Medicine and Radiopharmaceutical Therapy; Chapter 9.6, pp 43-45; Society of Nuclear Medicine; 2004

# Spill Procedure

## GENERAL RADIATION EMERGENCY PROCEDURE - SPILLS

### MINOR SPILLS -

Small volumes - Minor contamination incidents are an expected consequence of operations with radiopharmaceuticals. If discovered and cleaned up promptly, they are of no significant consequence and should not be considered to be spills. If the material is visible or has spread, it should be considered to be a spill.

#### 1. Stop the spill

- Stop the spread of the spill by covering with absorbent paper or other absorbent material.

#### 2. Warn other people

- Tell other people that a spill has occurred so that they will not inadvertently contaminate themselves or spread contamination.

#### 3. Clean up

- Decontaminate the area with detergent and water, paper towels.
- **WEAR GLOVES**
- Avoid spreading the contamination.

#### 4. Monitor the area

- Monitor the spill area with an appropriate survey instrument or by taking wipe samples.
- Removable contamination should be less than 22000 dpm/100 cm<sup>2</sup>. (1000 CPM with pancake detector)
- If contamination remains after reasonable decontamination efforts, call the RSO.

### MAJOR SPILLS -

Large volumes and/or high activities (i.e. >100 mCi Tc-99m).

**NOTE:** A spill that may cause an individual to receive more than 100 mrem exposure is considered a major spill. Exposure to that individual must be investigated and documented.

#### 1. Clear the area

- Warn everyone in the area and tell them to leave the room.

#### 2. Cover the spill

- Cover the spill with absorbent paper to prevent its spreading.

#### 3. Leave the room

- Make sure that everyone is out of the room then lock the doors.

#### 4. Call the RSO



- The RSO will give further instructions and/or will take charge at the scene.

#### 5. **Clean up**

- Decontaminate the area with detergent and water, paper towels.
- Wear gloves.
- Avoid spreading the contamination.

#### 6. **Monitor the area**

- Monitor the spill area with an appropriate survey instrument or by taking wipe samples.
- Removable contamination should be less than 22000 dpm/100 cm<sup>2</sup>.
- If contamination remains after reasonable decontamination efforts, call the RSO.

If the spill is very large or compromises an unrestricted area the NRC may require notification. Please contact your radiation safety consultant: John Fletcher (888) 667-2968.

#### **Fire**

Follow the standard fire procedure. Fire is a much more serious hazard than any radiation use at this institution.

Call the RSO - the RSO will advise the fire department.

#### **Personnel contamination**

##### 1. **Remove contaminated clothing**

- Monitor skin surfaces with an appropriate survey meter
- Measure skin contamination levels (in counts per minute) and record

##### 2. **Wash affected area with soap and water**

- Use only mild soap and water.
- Monitor the area after washing.
- Repeat. If contamination is not reduced by second washing, or if contamination remains after third washing-

##### 3. **Call the RSO**

The RSO may make recommendations for further action. Other agents are available for skin decontamination, but they may defat or abrade the skin, increasing the possibility of uptake. These agents will only be used when the risk is warranted. If necessary, skin dose calculations will be made by the radiation safety specialist. Call John Fletcher at (888) 667-2968.

**Radioactive Spill Report**

Time Spill Occurred \_\_\_\_\_ Client  
Location \_\_\_\_\_

Instrument to check for personal contamination and radiation levels:

\_\_\_\_\_

Personnel Monitored

\_\_\_\_\_

Radionuclide suspected in spill:

\_\_\_\_\_

Brief description of the incident


Brief description of clean-up (include final measurement results)


Follow up actions to prevent recurrence


Name: \_\_\_\_\_ Date: \_\_\_\_\_

RSO Review \_\_\_\_\_ Date: \_\_\_\_\_



DATE: September 5, 2006

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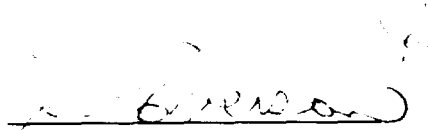
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3. **Clean up**
  - Decontaminate the area with detergent and water, paper towels.
  - **WEAR GLOVES**
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4. **Monitor the area**
  - Monitor the spill area with an appropriate survey instrument or by taking wipe samples.
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## Radioactive Spill Report

Time Spill Occurred \_\_\_\_\_ Client \_\_\_\_\_

Location \_\_\_\_\_

Instrument to check for personal contamination and radiation levels:

\_\_\_\_\_

Personnel Monitored

\_\_\_\_\_

Radionuclide suspected in spill:

\_\_\_\_\_

Brief description of the incident


Brief description of clean-up (include final measurement results)


Follow up actions to prevent recurrence


Name: \_\_\_\_\_ Date: \_\_\_\_\_

RSO Review \_\_\_\_\_ Date: \_\_\_\_\_

10-26-06

DATE

This is to acknowledge the receipt of your letter/application dated 10-26-06, and to inform you that the initial processing, which includes an administrative review, has been performed.

There were no administrative omissions. Your application will be assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card:

---

The action you requested is normally processed within 90 days.

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 471176.  
When calling to inquire about this action, please refer to this mail control number.  
You may call me at 817-860-8103.

Sincerely,



License Fee Assistant

BETWEEN:

License Fee Management Branch, ARM  
and  
Regional Licensing Sections

(FOR LFMS USE)  
INFORMATION FROM LTS

Program Code: 02220  
Status Code: 0  
Fee Category: 7C  
Exp. Date: 20150831  
Fee Comments:  
Decom Fin Assur Req'd: N

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED

DIAGNOSTIC IMAGING SERVICE OF IDAHO  
Applicant/Licensee: 20061106  
Received Date: 30369948  
Docket No.: 471176  
Control No.: 11-34221-01  
License No.: 11-34221-01  
Amendment  
Action Type:

2. FEE ATTACHED

Amount: \_\_\_\_\_  
Check No.: \_\_\_\_\_

3. COMMENTS

Signed *Colleen M. ...*  
Date 11-16-06

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /\_/)

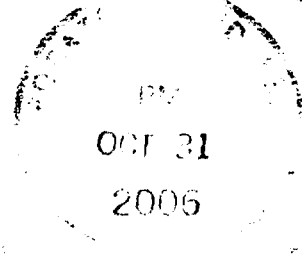
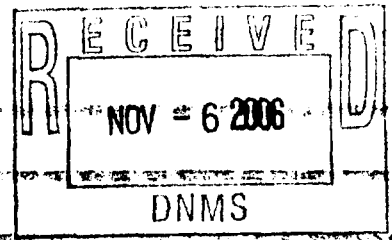
1. Fee Category and Amount: \_\_\_\_\_

2. Correct Fee Paid. Application may be processed for:

Amendment \_\_\_\_\_  
Renewal \_\_\_\_\_  
License \_\_\_\_\_

3. OTHER \_\_\_\_\_

Signed \_\_\_\_\_  
Date \_\_\_\_\_



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