



Radiation Safety Office

November 21, 2006

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

re: Control No. 139266

Dear Mr. Lawyer:

In reply to your letter dated September 22, 2006, the following response is provided. The numbering corresponds to your letter and your request for information is paraphrased for clarity.

1. It did not appear as if the appropriate amount of historical assessment was performed to adequately differentiate impacted from non-impacted areas.

Professors Cunningham, Edlind, and Morahan and Dean Murasko were interviewed. These faculty members were authorized users at 3300 Henry Avenue in the 1970's and are currently still on the faculty at Drexel University College of Medicine or Drexel University. Information they provided assisted with the response to item 2 below. An old exit route map of the 4th floor was found that also allowed us to correlate many of the old room numbers to the present space.

The former Radiation Safety Officer, Theodore Villafana, Ph.D., was also questioned regarding his knowledge of any long-lived, fixed contamination and acceptable contamination levels during his tenure as RSO. Prior to Dr. Villafana, Mr. Wayne Meyers was the RSO. Unfortunately Mr. Meyers is no longer alive; therefore, we were unable to contact him. We also contacted Neelam Bhalla, who was the RSO prior to Mr. Meyers and now works for the NRC.

2. In an application dated December 15, 1976 and in an application dated June 19, 1973, certain rooms (listed below) were identified as proposed areas of radioactive use. Surveys were not performed for these areas in your Final Status Survey Report. Please submit surveys for these areas.

In the 30 years that have elapsed since these referenced applications the use of these spaces changed. The room numbering schema also changed. The following table lists the rooms specifically listed in your letter, their location, and the survey conducted.

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MS-16

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Room	Description of Location	Survey Conducted
RIA Room B24/L	In the current floor numbering schema the 3 rd floor was previously referred to as the basement floor. Rooms starting with the letter 'B' are, therefore on the 3 rd floor on the attached facility diagrams. The entire 3 rd floor was reprogrammed to maintenance and facilities management over 15 years ago. The room most likely to have been B24 (evidence includes the presence of a no longer functioning walk-in cooler) is indicated as such on the enclosed facility layout.	The room was visually inspected 4/22/04. Radiation detection instruments were not used as the area was clearly a maintenance area (a large inventory of fan belts are stored in here). It was visually inspected again and surveyed with a thin-window GM survey meter. NRC inspectors also surveyed the room with microrem meters. No evidence of radioactivity was present. Surveyor: Kendall Berry Date: November 14, 2006
Microbiology Room G13/C	In the current floor numbering system, the 4 th floor was previously referred to as the ground floor. Rooms starting with 'G' are, therefore, on the 4 th floor on the attached facility diagrams. The C refers to the Commonwealth Building.	This room was converted to office space over 10 years ago.
Pharmacology Rooms 313C and 314C	In the current floor numbering system, the 7 th floor was previously referred to as the 300 level. Rooms numbered 300 – 399 are, therefore, on the 7 th floor on the attached facility diagrams. Assuming that 313C is above G13C, the facility diagram has been accordingly annotated.	These rooms were converted to non-laboratory space.
Rooms 12R, 15R, 16R, and 17 R of Floor G	Rooms designated G12R - G15R in 1976 were renovated and are now part of a large laboratory designated 4R056 and 4R057 which was surveyed 4/4/06 (previously submitted). Rooms 16R and 17R are non-laboratory areas adjacent to the laboratory space.	Previously submitted survey report covers 12R and 15R.
Animal Facility, Rooms 31 and 32	The animal facility was on what is now the 4 th floor. The animal facility was reprogrammed and was most recently in use by Woman's Medical Hospital as a hazardous material decontamination facility in the event of a mass NBC contamination event. A chest freezer labeled with very old caution radioactive materials labels was found in G28R.	Rooms 31 and 32 were identified from the exit route map discussed in item 1. See the attached survey reports for these rooms. Kent Lambert surveyed the refrigerator with a thin window GM detector. No evidence of radioactivity was found. Ms. Penny Lanzisera and Ms. Tara Weidner of the NRC Region I can verify that the survey was conducted and that no evidence of radioactivity was present

There have been changes to the laboratory surveillance program over the decades. Prior to 1993, the maximum amount of removable contamination in any spot was 5000 cpm/100 cm², and the average amount of removable contamination was 1000 cpm/100 cm². In 1993, the standard was reduced to 200 dpm/100 cm². Currently the standard for

removable contamination is 1000 dpm/100 cm². These are all well below established screening values for the long lived radioisotopes known to have been used.

3. The Final Status Survey Report states that there are some radioactive materials remaining in WMH Waste Room 1st floor. These materials need to be appropriately disposed before this location may be removed from the license.

As of November 14, 2006, there were no radioactive materials in the 1st floor waste room. This can be verified by Ms. Penny Lanzisera and Ms. Tara Weidner of the NRC Region I.

4. For all sealed sources, including sources no longer in the licensee's possession, provide the most recent leak test. For leak tests no longer required to be maintained, state if you have any known leaking sealed sources.

Drexel University College of Medicine did not possess sealed sources at this location. We have no knowledge of any leaking sealed sources.

5. Confirm that you will maintain 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.

We confirm that we will maintain the required 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.

Short lived radioactive material was held for decay and disposed without regard to its radioactivity in accordance with license condition number 22. Short lived radioactive material in storage for eventual disposal was moved to our Queen Lane location. Long-lived radioactive waste was disposed through a waste broker. The most recent waste disposal records are attached. Radioactive material still of value to the laboratory were moved to the Broad and Vine Street use location.

7. In support of an environmental assessment related to the release of the facility please provide:

- a) The name of the facility to be released.

Philadelphia Health and Education Corporation, d/b/a Drexel University College of Medicine at the Woman's Medical Hospital

- b) The size of the building in square feet.

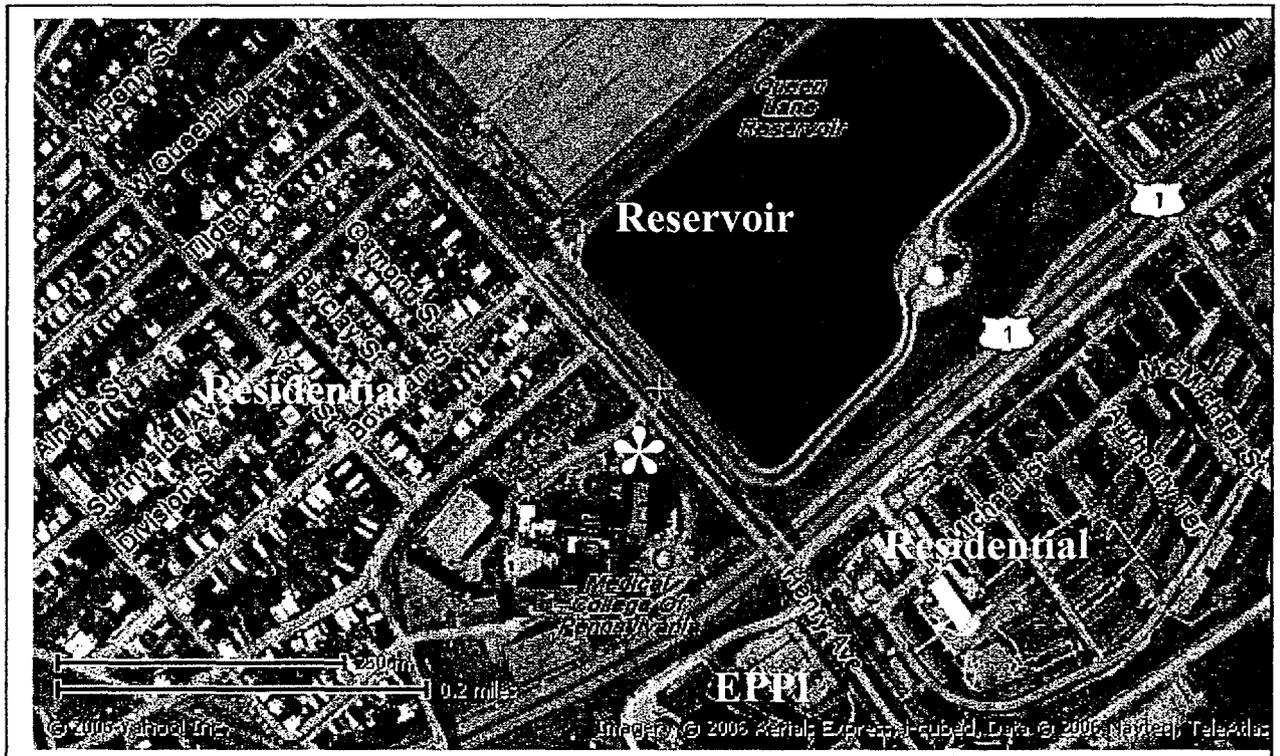
The building complex is over 600,000 square feet.

- c) A description of the type of building use.

Areas under DUCoM control can be described as general office and laboratory space.

d) A description of the surrounding area

Immediately south of 3300 Henry Avenue is Route 1 followed by Eastern Pennsylvania Psychiatric Institute. Northwest of 3300 Henry Avenue is a residential area. Northeast of 3300 Henry Avenue is the Queen Lane Reservoir. East of 3300 Henry Avenue is a residential area.



e) A description of the general type of activities authorized on the license.

Laboratory procedures typically performed on bench tops and in hoods were performed at this location under this license. Some *in vivo* research was also performed.

f) The date that licensed activities ceased.

The laboratory ceased experiments on or around July 7, 2006. The laboratory move was completed by July 26, 2006. Final surveys of the facility were conducted July 28, 2006. The lease agreement for Drexel University College of Medicine to occupy space at the property ended July 31, 2006.

Please feel free to contact me if you have any additional questions.

Sincerely,

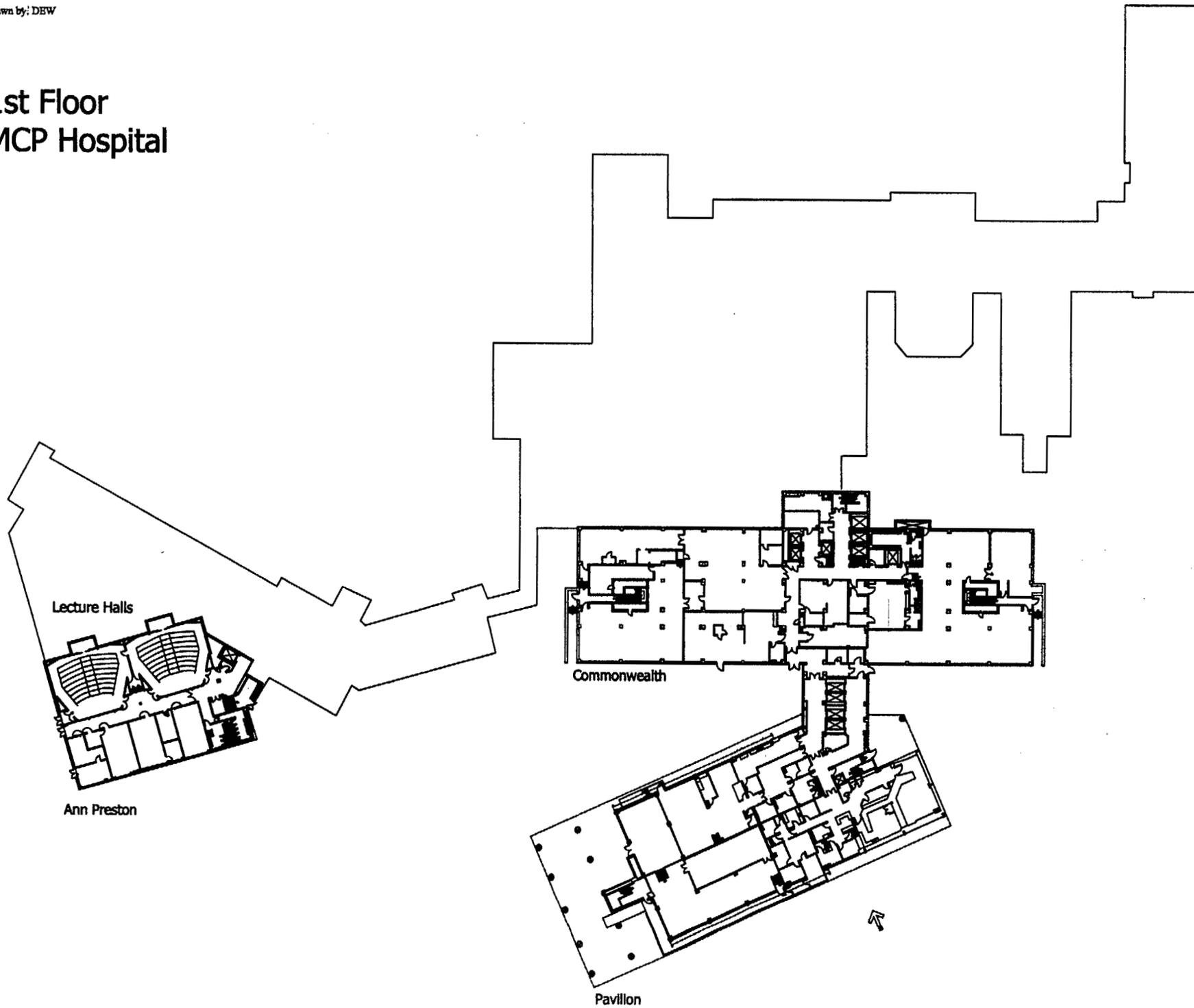
A handwritten signature in black ink, appearing to read "Kent Lambert", with a long horizontal flourish extending to the right.

Kent Lambert, M.S., CHP
Director, Radiation Safety
Radiation Safety Officer

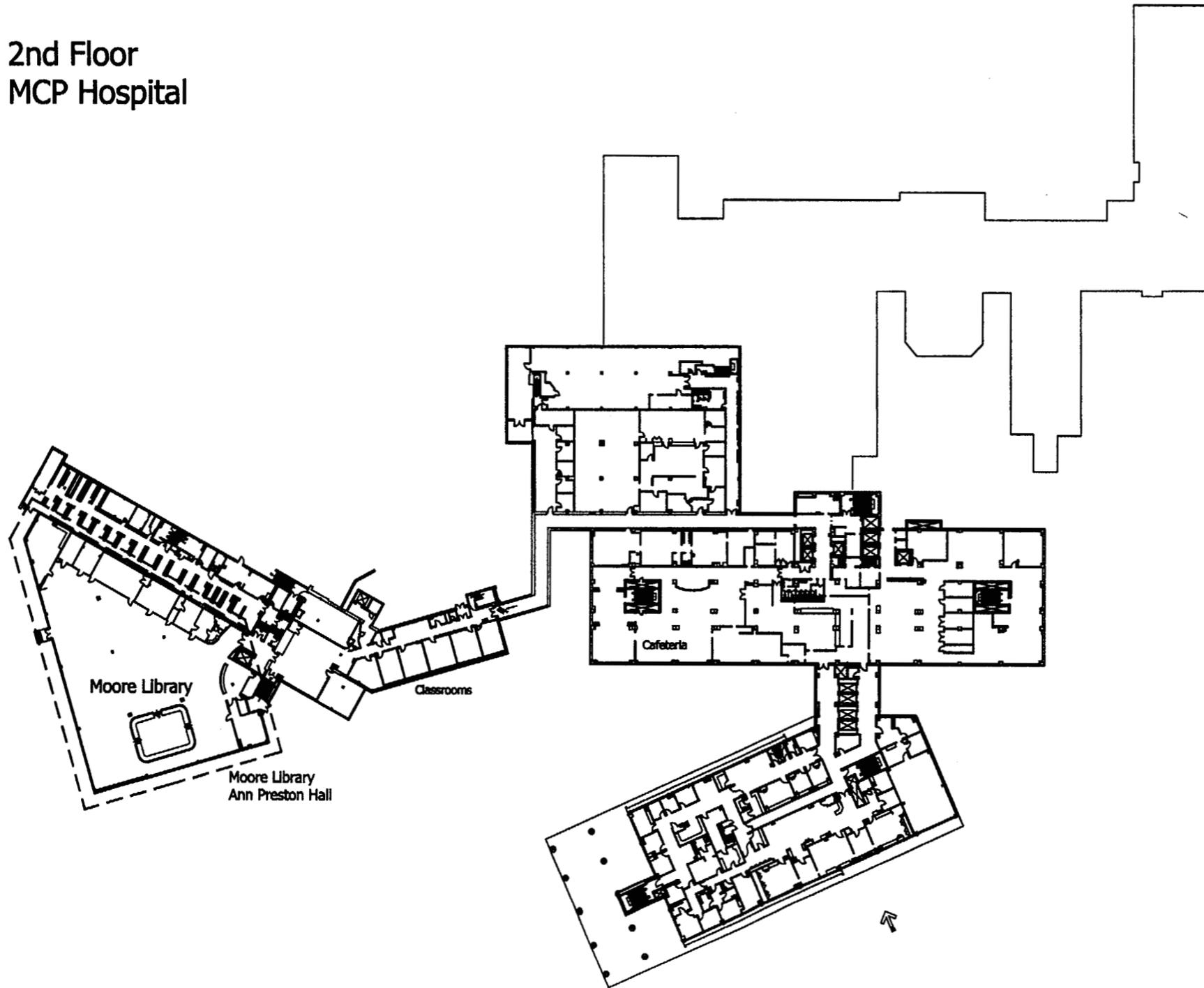
cc: S. Murthy, Ph.D.



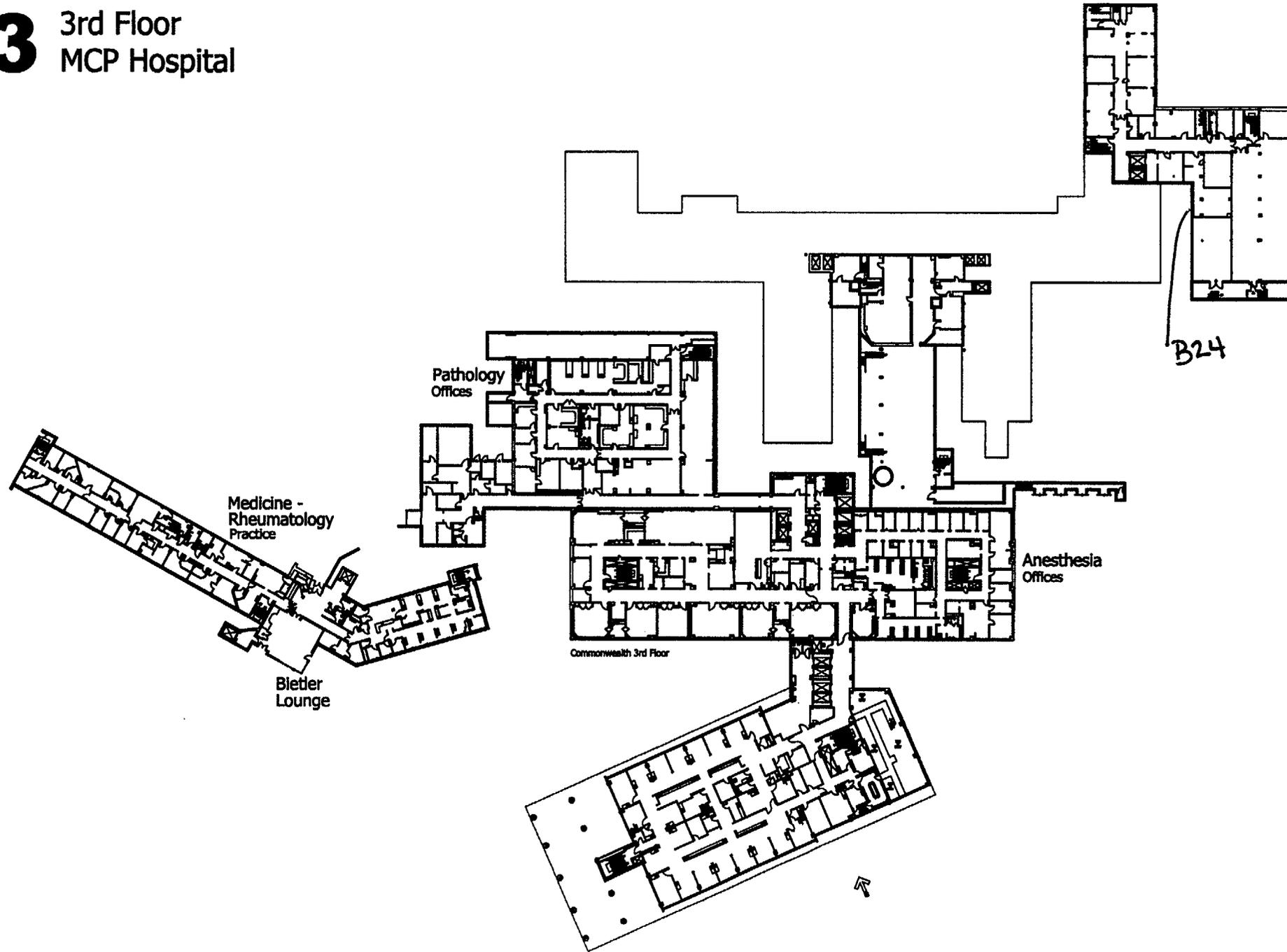
1 1st Floor MCP Hospital



2 2nd Floor MCP Hospital

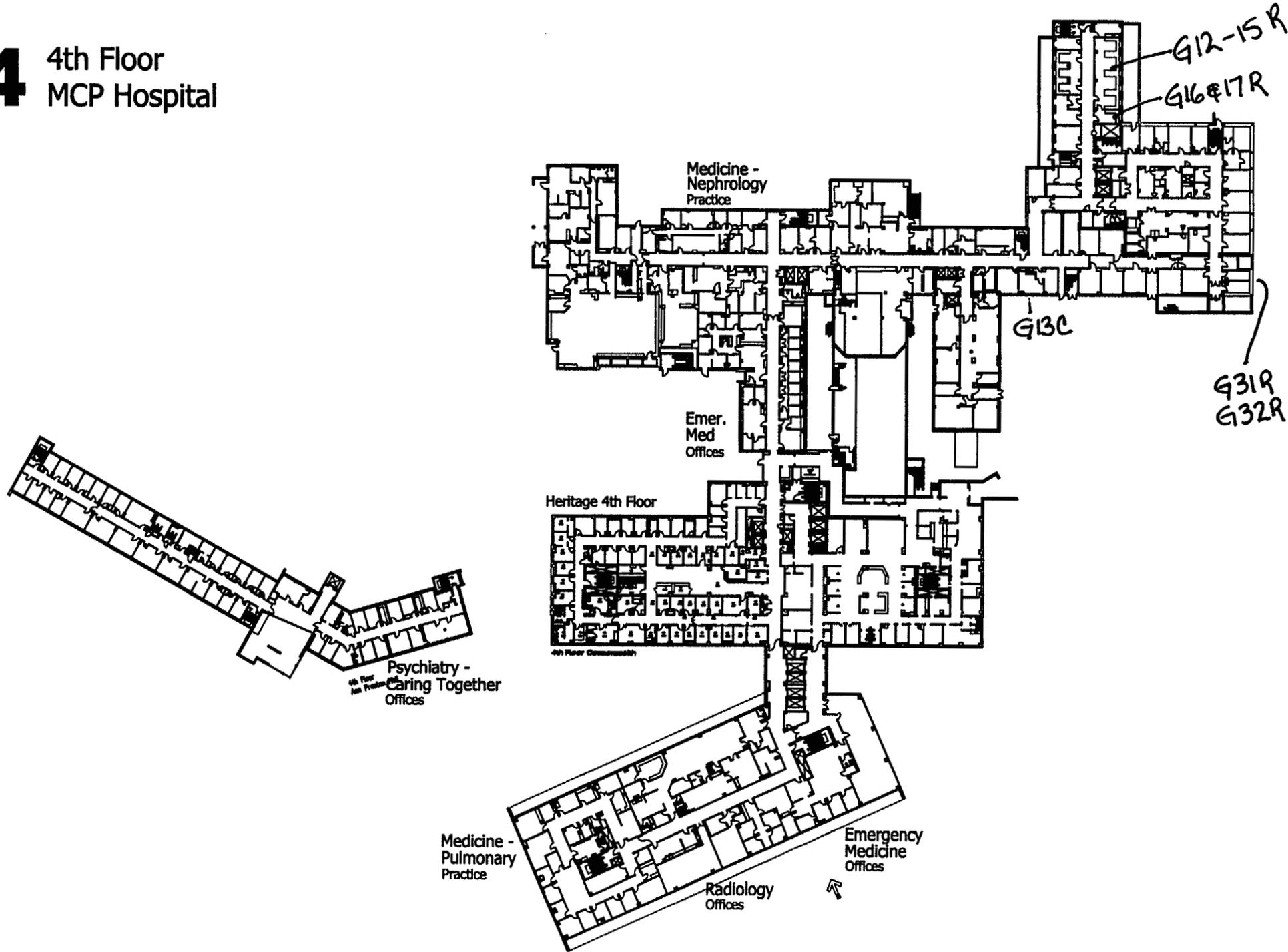


3 3rd Floor MCP Hospital



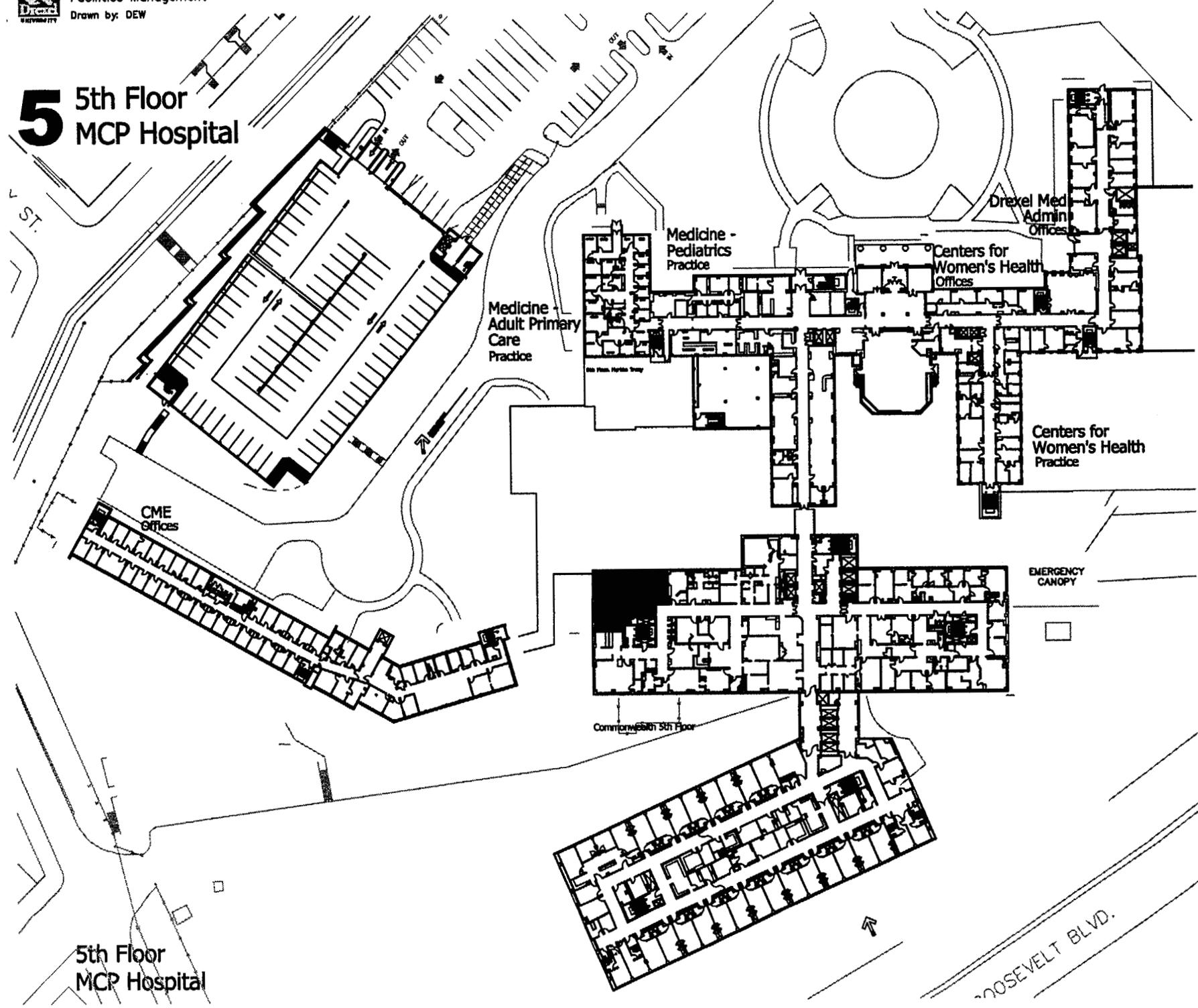


4 4th Floor MCP Hospital





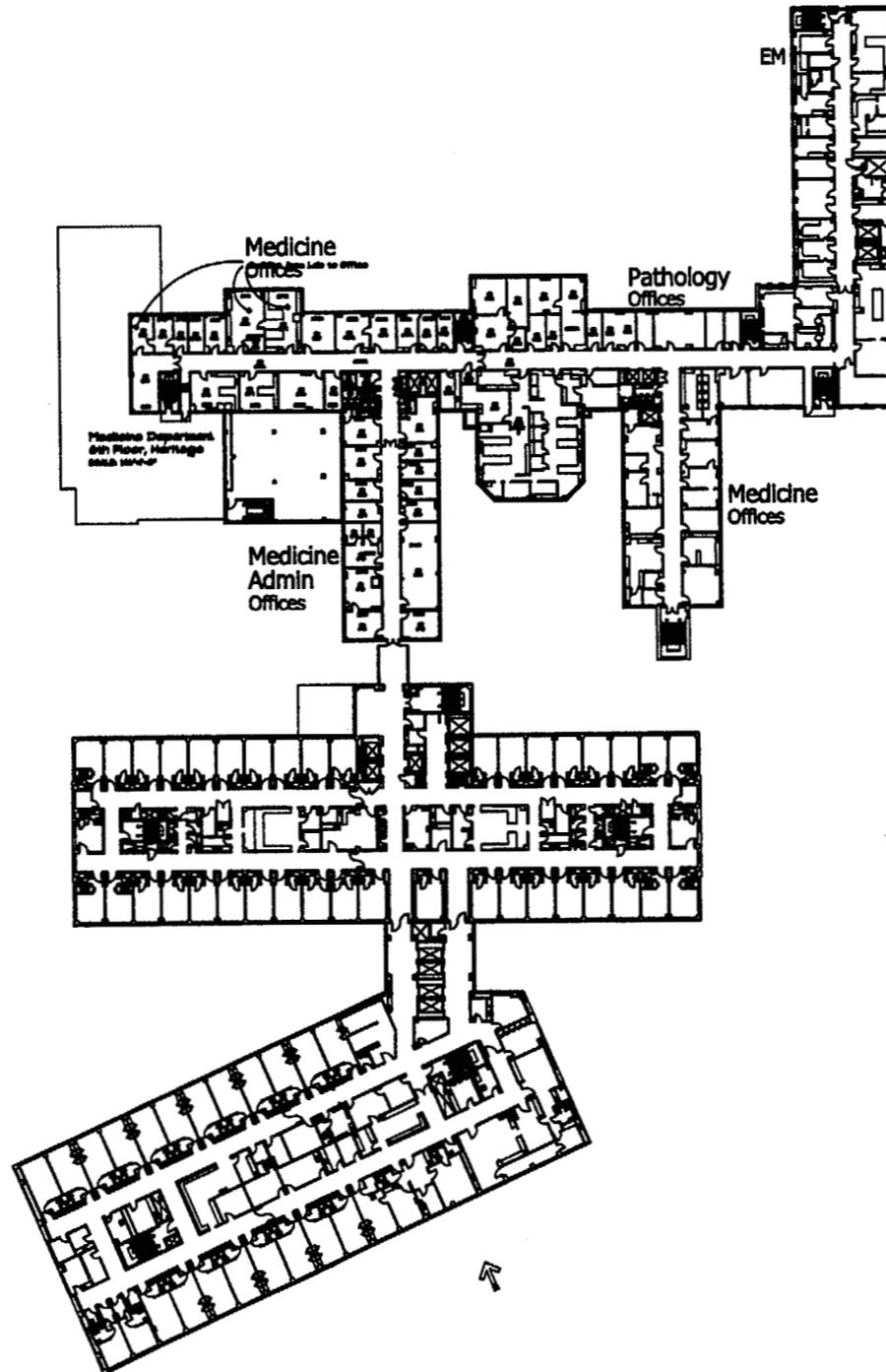
5th Floor MCP Hospital



5th Floor
MCP Hospital

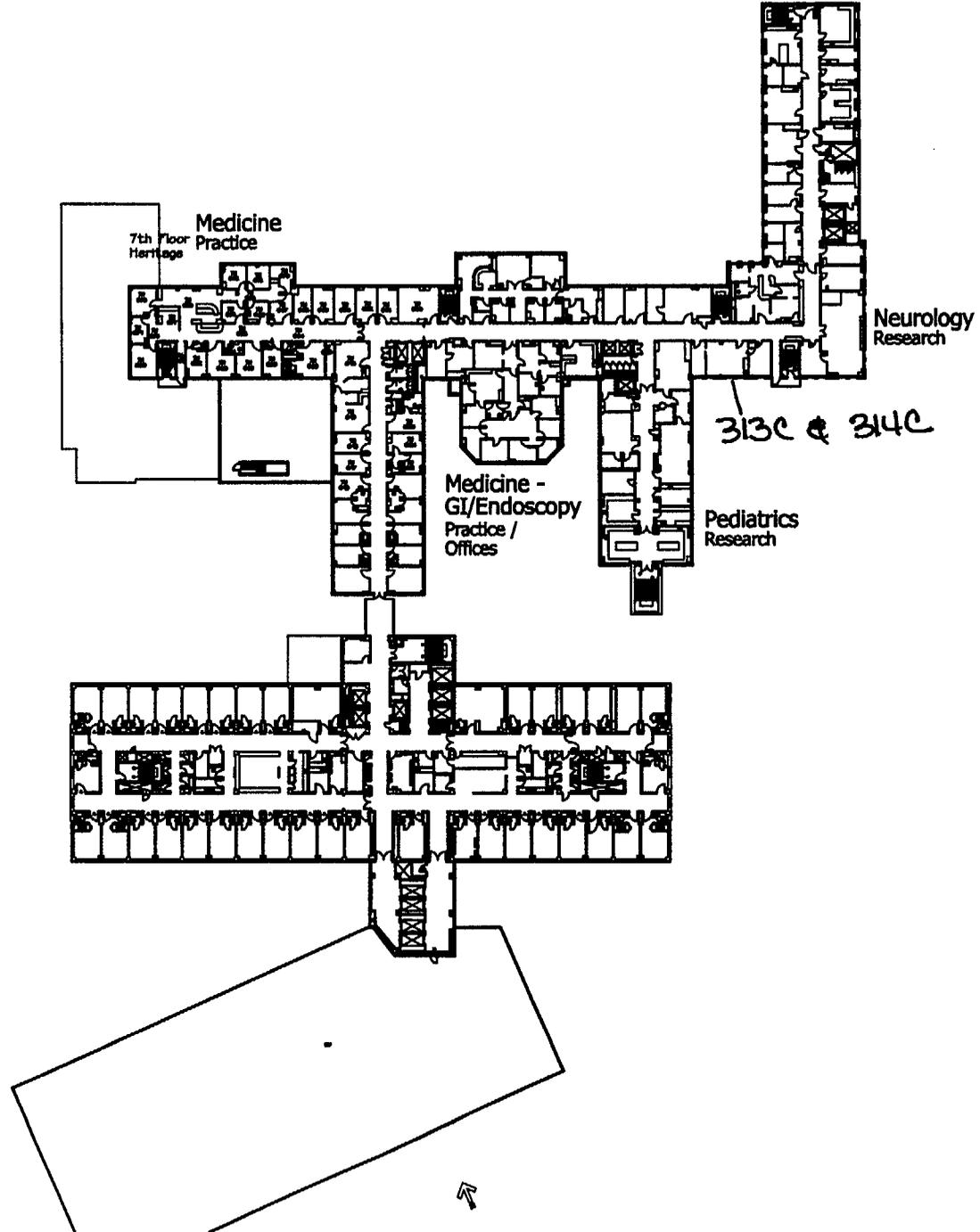


6 6th Floor MCP Hospital



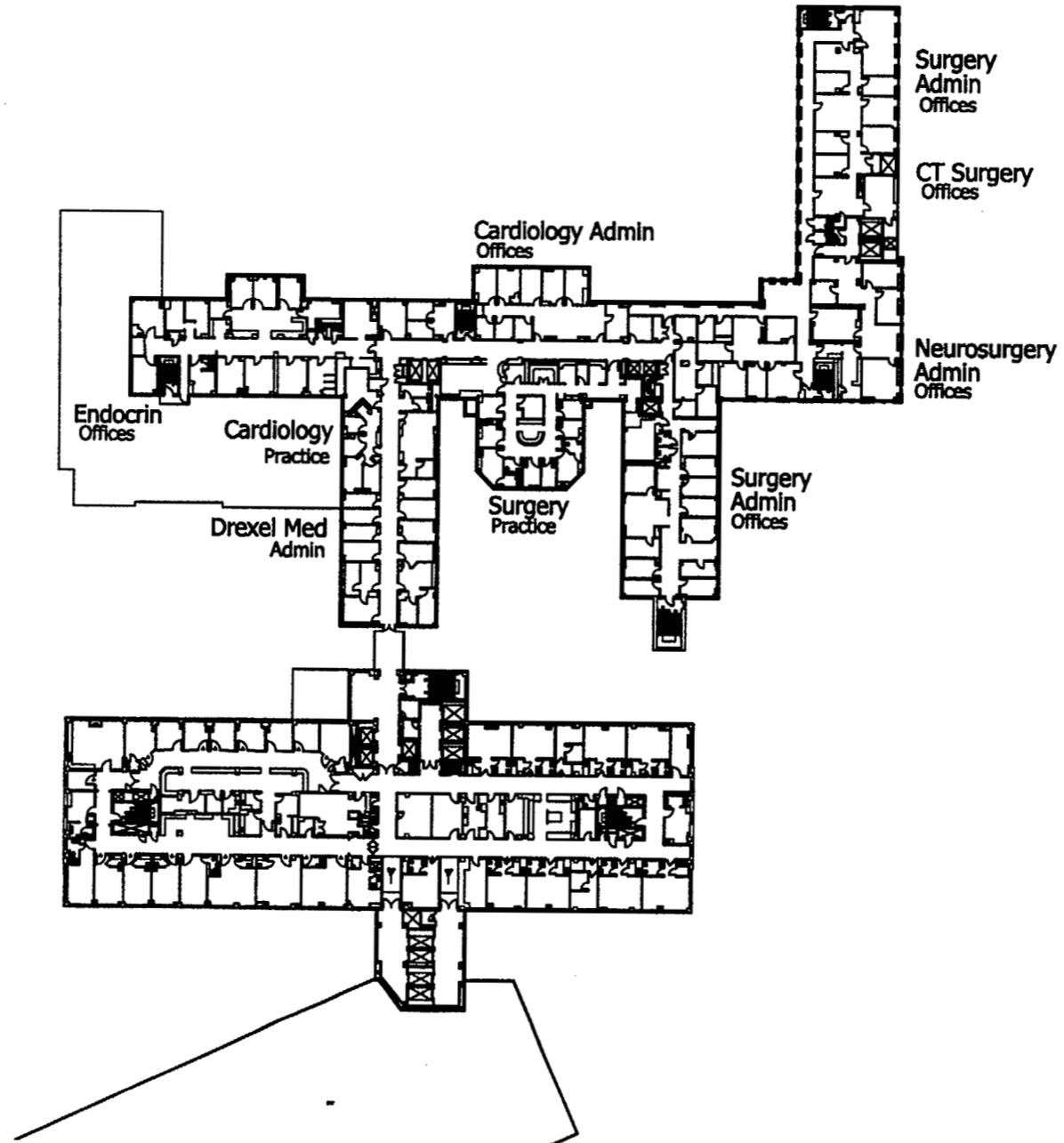


7 7th Floor MCP Hospital



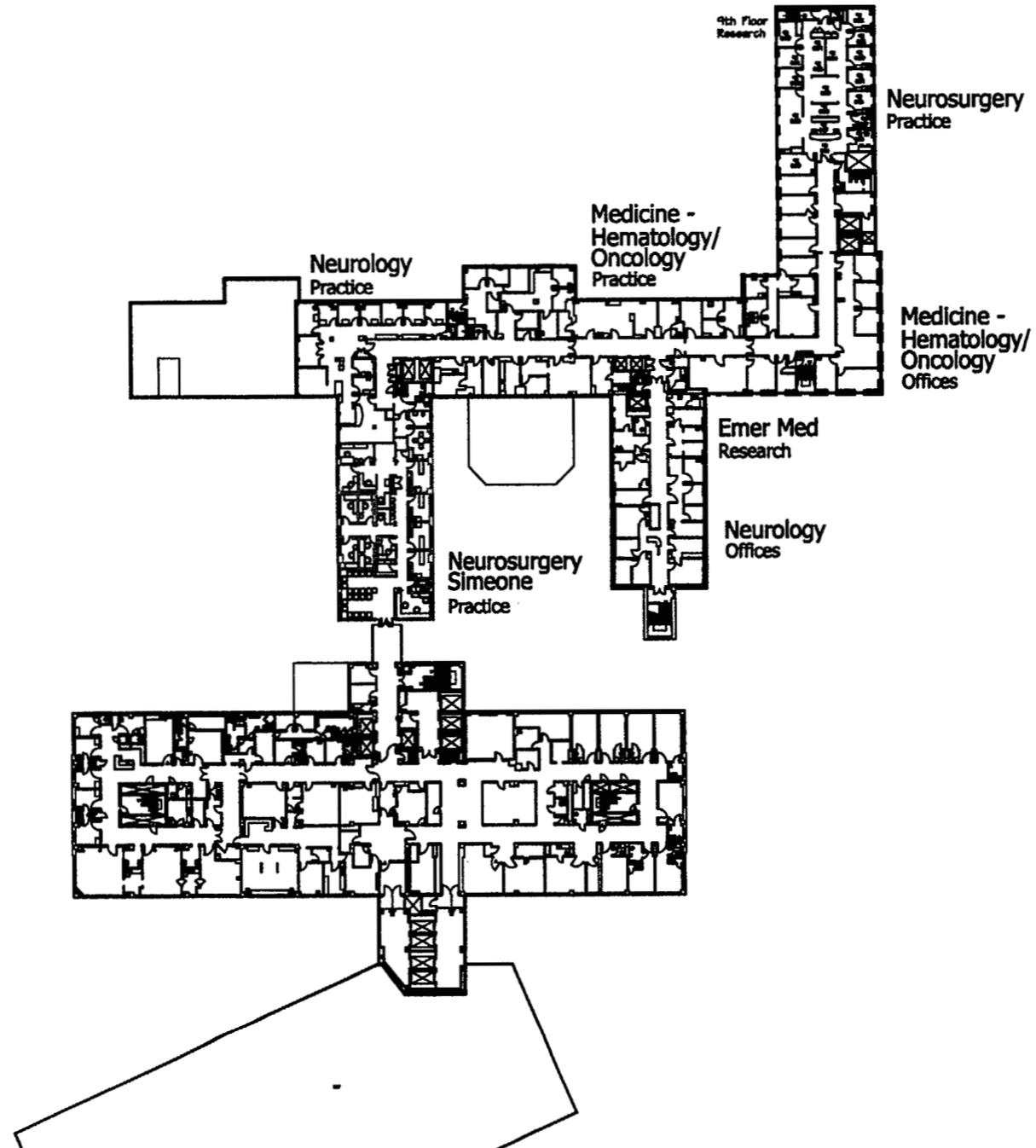


8 8th Floor MCP Hospital





9 9th Floor MCP Hospital





P.O. Box 817 — Kingston, TN 37763 — (865) 220-8501

July 8, 2005

Dear Valued Customer,

As required by 10 CFR Part 20 (Appendix G), this letter is notification that Duratek has received the shipment recently picked up at your facility on **June 14, 2005**. Attached you will find a copy of your NRC Form 540, the only change from the original is in Item No. 9 "signature" which identifies that Duratek is acknowledging receipt of waste from your facility.

Please keep this with your original, as well as future disposal certifications.

If you have any questions please feel free to contact me at (865) 220-8501.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mia Hammonds", written over a horizontal line.

Mia Hammonds, Adm. Assistant
Bionomics, Inc.

Cc: File GTS-05-016

U.S. NUCLEAR REGULATORY COMMISSION NRC FORM 540 AND 541A LOW-LEVEL RADIOACTIVE WASTE		8. SHIPPER ID. NUMBER PHEC-DUCCOM 3300 HENRY AVE. PHOENIX, AZ 85018		7. NRC FORM 540 AND 541A PAGE 1 OF 1 NRC FORM 541 AND 541A PAGE(S) 1 NRC FORM 542 AND 542A PAGE(S) 0 ADDITIONAL INFORMATION PAGE(S) 0		8. MANIFEST NUMBER (Use this number on all continuation pages) 61405-F	
1. EMERGENCY TELEPHONE NUMBER (Include Area Code) (865) 226-3523		5. CONTACT KENDALL BERRY TAG TRANSPORT 2818 ROANE STATE HWY. HARRIMAN TN 37748		9. CONSIGNEE Name and Facility Address DURATEL 1560 BEAR CREEK RD OAK RIDGE TN 37831		CONTACT DONNIE BRACKETT TELEPHONE NUMBER (Include Area Code) (865) 481-0222	
2. ORGANIZATION BIONOMICS, INC.		6. CARRIER Name and Address TAG TRANSPORT 2818 ROANE STATE HWY. HARRIMAN TN 37748		10. CERTIFICATION This is to certify that the herein-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. This also certifies that the materials are classified, packaged, marked, and labeled and are in proper condition for transportation and disposal as described in accordance with the applicable requirements of 10 CFR Parts 20 and 61, or equivalent state regulations.		DATE 6/24/05	
3. TOTAL NUMBER OF PACKAGES IDENTIFIED ON THIS MANIFEST 1		11. U.S. DEPARTMENT OF TRANSPORTATION DESCRIPTION (including proper shipping name, hazard class, UN ID number, and any additional information) RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA II), 7, UN3321 (FOR COMPACTION ONLY)		12. DOT LABEL "RADIOACTIVE" N/A		13. TRANSPORT INDEX N/A	
4. DOES EPA REGULATED WASTE REQUIRING A MANIFEST ACCOMPANY THIS SHIPMENT? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		14. PHYSICAL AND CHEMICAL FORM SOLID/CRYSTALS		15. INDIVIDUAL RADIONUCLIDES H3, KR85, U235		16. TOTAL PACKAGE ACTIVITY IN SI UNITS 18.7220 mCi	
EPA MANIFEST NUMBER N/A		17. LSA/SCO CLASS LSA II		18. TOTAL WEIGHT OR VOLUME (Use appropriate units) 0.11m ³		19. IDENTIFICATION NUMBER OF PACKAGE DSH-1	
5. CONTACT GARY KINDRICK SIGNATURE - Authorized carrier acknowledging waste receipt [Signature]		10. CERTIFICATION (continued) AUTHORIZED SIGNATURE [Signature] TITLE Supervisor DATE 6-14-05		10. CERTIFICATION (continued) SIGNATURE - Authorized consignee acknowledging waste receipt [Signature]		10. CERTIFICATION (continued) DATE 6/24/05	
FOR CONSIGNEE USE ONLY:							