



July 12, 2007

U.S. Nuclear Regulatory Commission
Region III
Materials Licensing Branch
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Dear Reader:

Re: NRC License Number 24-00128-03 (

We request amendment of our license to change the specified maximum amount (item 8F of our license) of "Iridium-192, as permitted by 10 CFR 35.1000." We request that the maximum amount specified be "Two sources, 21 curies total."

We are requesting this amendment for the following reasons. The SSDR for this device allows a maximum source strength of 15 curies. The FDA currently restricts human use with this device (Varian MammoSource) to 10 curies maximum source strength. When the manufacturer (Varian) ships a new source to us in preparation for a source exchange, the new source may have activity greater than 11 curies, even though the source is allowed to decay to 10 curies before installation in order to satisfy FDA requirements. At the time of source exchange, the old source typically has decayed to less than 4.3 curies (90 days of decay), and, with a new source in storage of 11 curies, the total activity is only 15.3 curies. The current wording in item 8F of our license, "one source not to exceed 11 curies," was added to the license without our request, and we believe this restriction is unnecessarily burdensome.

If you have any questions regarding this matter, please feel free to contact Sam Hancock at 573-651-5544.

Sincerely,



Sam S. Hancock, Ph.D.
Radiation Safety Officer



Pat Bira
Vice President

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*** Southeast Missouri Hospital
Regional Cancer Center**

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