



**ST. JOHN'S MERCY
MEDICAL CENTER**



March 20, 2009

Nuclear Material Licensing Branch
Region III, U.S. N.R.C.
2443 Warrenville Road, Suite 210
Lisle, IL. 60532-4352

Re : New Area of Use

To Whom It May Concern:

This letter is an amendment request to add a new area of use to St. John's Mercy Medical Center material license 24-00794-03. The new area of use is located at The St. Louis Surgical Center, 760 Office Parkway, Creve Coeur, MO 63141. The new area of use is intended for patients undergoing sentinel lymph node and breast surgery who have been injected with 10 CFR 35.200 materials from the Nuclear Medicine department at St. John's Mercy Medical Center. Some preliminary pathology may be performed on site, however, tissue samples will be stored on site until injected quantities of materials contained in the tissue samples are decayed to exempt quantities before they are released to an off site pathology laboratory for more extensive analysis.

Enclosed you will find a copy of the floor plan, showing where surgery, storage of tissue, storage of waste, and pathology will be performed. All tissue samples will be placed in leak proof containers and stored in lockable cabinets. All waste generated from the surgery procedures will be placed in leak proof containers and placed in lockable cabinets. All cabinets will be secured to counter tops or tethered to the wall for security purposes so that they cannot be removed without proper authorization.

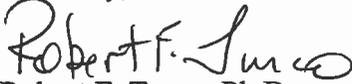
Training of all personnel concerning radiation safety, performance of radiation surveys and wipe tests, and record keeping will be done by the Radiation safety Officer or his designee. Accountability of all tissue containing licensed material will be maintained from the time of receipt to the time released to the offsite path lab. All waste will be held and released to normal or biohazardous waste when radiation levels reach background levels and records of disposal will be maintained. All ambient radiation surveys and wipe testing will be performed in accordance with the "Model Procedure for Area Surveys" described in Appendix R of NUREG -1556 Volume 9 Revision 2. Results of these surveys will be evaluated after 6 months. If survey results show that radiation and /or removable contamination levels are less than or equal to maximum allowable levels in

unrestricted areas, all surveys will be discontinued. Otherwise, St. John's Mercy Medical Center will abide by all constraints, conditions, requirements, and commitments of its current material license for the addition of this new area of use.

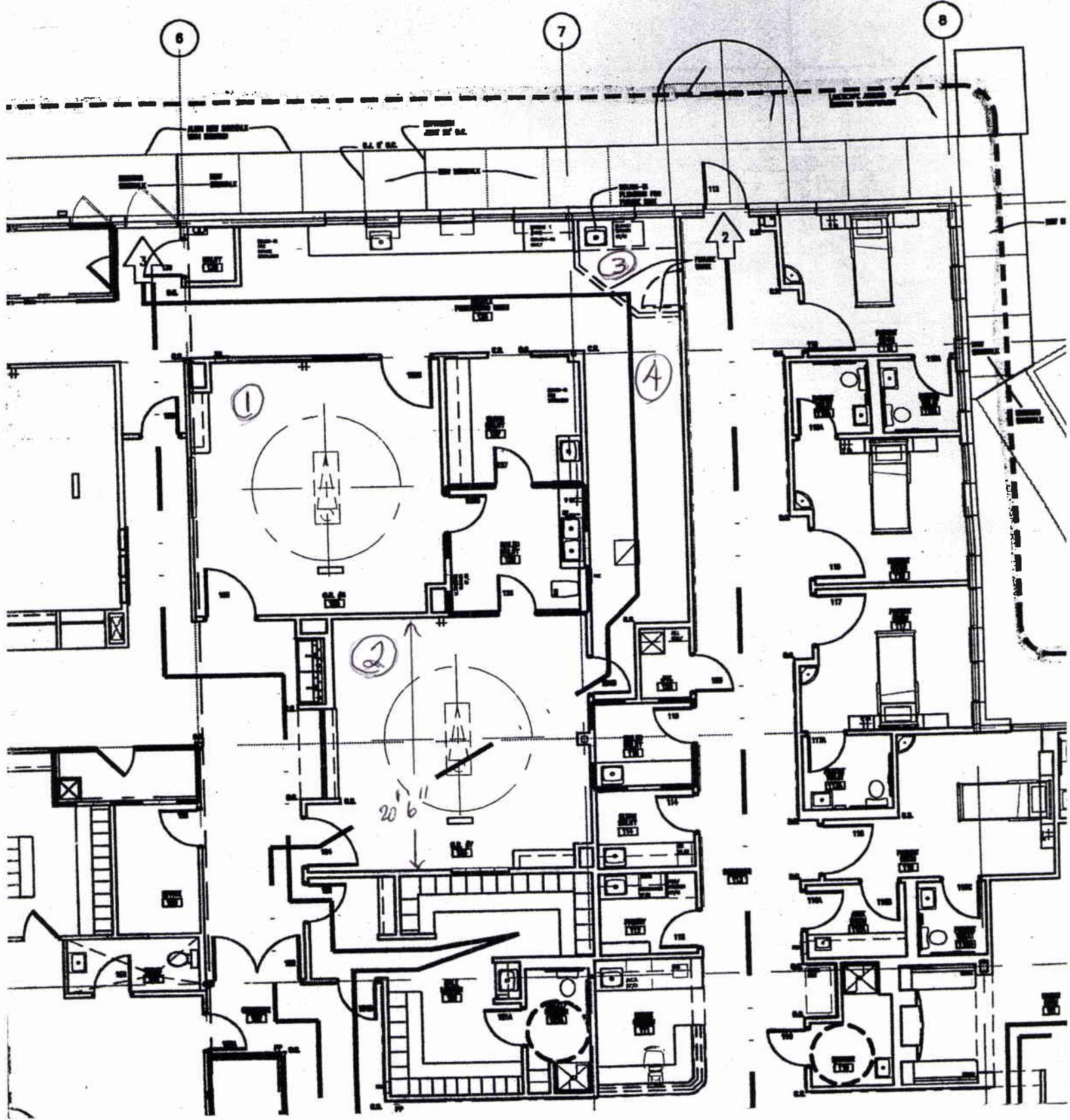
We hope that you will consider expedition of this request so that clinical operations at this facility may begin as soon as possible. Surgeons who have performed these procedures at other facilities have just begun working at St. John's and would like to provide this service at the surgery center for St. John's as soon as possible.

If you have any additional questions, concerns, or require additional information regarding this amendment request, please contact me at 314-251-6693 ext. 27551 (desk) or 314-307-0664 (cell).

Sincerely,

A handwritten signature in black ink that reads "Robert F. Turco". The signature is written in a cursive style with a large initial "R" and a stylized "T".

Robert F. Turco, Ph.D.
Radiation Safety Officer



Areas

- ① OR #6
- ② OR #7
- ③ Pathology work area
- ④ STORAGE OF TISSUE / WASTE

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St. John's Mercy Medical Center
Radiation Safety
607 So. New Ballas Rd., Ste. 1275
St. Louis, MO 63141

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