

Torres, RobertoJ

From: Eric Robinson [Erobinson@cwnsurgery.com]
Sent: Wednesday, March 17, 2010 11:36 AM
To: Torres, RobertoJ
Subject: RE: Completion of review
Attachments: Response Letter 2.pdf

Mr. Torres,

Please find attached our response to your request. It is our assumption that our document titled "Procedure for Release of Patients Administered Radioactive Materials" was not specific enough to answer question #5 on your previous request, so we have agreed to incorporate Appendix U. I look forward to hearing from you soon.

Thanks

Eric Robinson
Imaging Director
Mountain View Clinic
Central Wyoming Neurosurgery
6600 E 2nd Street
Casper, WY 82609
Cell: 307-259-7975
Office: 307-473-6741

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MAR 18 2010

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From: Torres, RobertoJ [mailto:RobertoJ.Torres@nrc.gov]
Sent: Tuesday, March 16, 2010 1:34 PM
To: Eric Robinson
Subject: Completion of review

Mr. Robinson:

Thank you for your response letter dated March 15, 2010. I have reviewed the response and there are two remaining items that need correction before the license is issued.

1. Please indicate where in your operating procedures state how the physician is going to verify that the patient is not pregnant prior to administration of Iodine-131.
 - A. Provide copy of the verification procedure, or
 - B. Commit to incorporate such process in your procedures and briefly describe the verification process. These procedures will be reviewed during the next inspection.
2. Question 5 of my email dated February 10, 2010 states: Explain how Central Wyoming Neurosurgery is going to comply with 10 CFR 35.75, patient release criteria. Provide procedures for administration of I-131 and instructions that will be given to patients after the patient is administered I-131. The patient release criteria were not described in your response letter dated March 15. Appendix U of NUREG-1556, Volume 9, Revision 2 (see attached) contains patient release criteria (activity and dose rate criteria), when to give instructions to patients (activity and dose rate criteria), and activity criteria for breastfeeding patients. For Iodine-131, Appendix U provides an activity limit of 33 millicuries for authorizing patient release and a dose rate limit of 7 mrem/hour at 1 meter for authorizing patient release. Appendix U also provides activity and dose rate criteria which instructions should be given

when authorizing patient release after administration of Iodine-131 (activity above 7 millicuries and dose rate above 2 mrem/hour at 1 meter).

- A. Provide copy of the procedure that incorporates the patient release criteria, instructions criteria and breastfeeding patient criteria described Appendix U of NUREG-1556, Volume 9, Revision 2, or
- B. Commit to incorporate Appendix U of NUREG-1556, Volume 9, Revision 2, in its entirety into your operating procedures. These procedures will be reviewed during the next inspection.

Please provide your responses/commitments in a signed and dated letter by Dr. Narotzky by reply email as a pdf file. Thank you.

Roberto J. Torres
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U.S. Nuclear Regulatory Commission - Region IV
Division of Nuclear Materials Safety
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800-990-6824

16 March 2010

Mr. Torres

Please find below the requested response to the questions you had regarding our RAM license dated March 16, 2010. Our responses to your questions are in Bold, Italicized text, and all supporting documentation has been attached. Please let me know if you have any further questions. It has been a pleasure working with you and we look forward to your response.

1. Please indicate where in your operating procedures state how the physician is going to verify that the patient is not pregnant prior to administration of Iodine-131.

Central Wyoming Neurosurgery commits to incorporate processes in our procedures to verify that the patient is not pregnant prior to administration of Iodine-131. Verification will be confirmed by way of pregnancy test on all female patients within child bearing years unless confirmed by prior hysterectomy or tubal ligation. These procedures will be reviewed during the next inspection.

2. Question 5 of my email dated February 10, 2010 states: Explain how Central Wyoming Neurosurgery is going to comply with 10 CFR 35.75, patient release criteria. Provide procedures for administration of I-131 and instructions that will be given to patients after the patient is administered I-131. The patient release criteria were not described in your response letter dated March 15. Appendix U of NUREG-1556, Volume 9, Revision 2 (see attached) contains patient release criteria (activity and dose rate criteria), when to give instructions to patients (activity and dose rate criteria), and activity criteria for breastfeeding patients. For Iodine-131, Appendix U provides an activity limit of 33 millicuries for authorizing patient release and a dose rate limit of 7 mrem/hour at 1 meter for authorizing patient release. Appendix U also provides activity and dose rate criteria which instructions should be given when authorizing patient release after administration of Iodine-131 (activity above 7 millicuries and dose rate above 2 mrem/hour at 1 meter).

Central Wyoming Neurosurgery commits to incorporate Appendix U of NUREG-1556, Volume 9, Revision 2, in its entirety into our operating procedures. These procedures will be reviewed during the next inspection.

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This response has been written by Eric Robinson, Imaging Manager, on behalf of Central Wyoming Neurosurgery. If you have any questions please feel free contact him any time.

A handwritten signature in black ink that reads "Robert A. Narotzky MD".

Robert A. Narotzky, M.D.
Owner

Torres, RobertoJ

From: Torres, RobertoJ
Sent: Tuesday, March 16, 2010 2:34 PM
To: 'Eric Robinson'
Subject: Completion of review
Attachments: NUREG1556v9r2.pdf

Mr. Robinson:

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Please provide your responses/commitments in a signed and dated letter by Dr. Narotzky by reply email as a pdf file. Thank you.

Roberto J. Torres
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