

From: Frazier, Cassandra
Sent: Wednesday, March 10, 2010 10:05 AM
To: Simmons, Tye
Subject: FW: Unique permit condition
Attachments: San Antonio draft amendment.doc

[electronic version](#)

From: Williams, Gary E [mailto:Gary.Williams3@va.gov]
Sent: Tuesday, October 20, 2009 10:09 AM
To: Frazier, Cassandra
Cc: Thomas.Huston2@va.gov
Subject: Unique permit condition

Sandy,

I am sending this e-mail for NRC feedback on a proposed unique permit condition for San Antonio.

Their affiliate university has an agreement state license to perform eye implants using I 125 seeds.

Normally, the patient is sent home for a few days after the procedure and then returns for evaluation, removal of the seeds, and release under regulations equivalent to 10 CFR 35.75.

For some VA patients that might be treated at the affiliate university with this eye implant therapy, the best course of clinical care is to have the patient hospitalized.

The patient procedure would occur at the affiliate university under their radioactive material license by a physician authorized user.

The treatment procedure is to transfer the patient (with sources implanted) from the affiliate university to be admitted to the VA facility.

San Antonio would temporarily take custody of the sources, add the sources to their VA source inventory, and assume radiation safety responsibility under their permit while the patient is hospitalized.

While at the VA facility, the patient is not required to have ongoing care by the physician authorized user. Under the equivalent agreement state procedures, the patient would have been in their private home. Of course, the physician authorized user would be available if needed.

When clinically appropriate, the patient would be transferred back to the affiliate university for source removal and final source accounting under the university agreement state license.

The patient movement does not pose a problem since an enclosed walkway leads from the university hospital to the VA facility.

Since the patient will have a lead patch in position, the potential for radiation exposure to the public is minimal.

I am attaching a draft amendment for the San Antonio permit. The changes to establish this unique permit condition are shown in yellow highlight.

Please let me know if you have any questions about this unique permit condition.

<<San Antonio draft amendment.doc>>

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E-mail Properties

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Toye.Simmons@nrc.gov (Simmons, Toye)
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Options

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