

June 16, 2011

FRANCISCAN ALLIANCE
CORPORATE OFFICE
Mishawaka

Mr. James Mullauer
Nuclear Regulatory Commission
(james.mullauer@nrc.gov)

FRANCISCAN
ST. ANTHONY HEALTH
Crown Point

Re: Request to grant exemption to use existing
Cs137 sources (manufacturer Radiation
Therapy Resources)

FRANCISCAN
ST. ANTHONY HEALTH
Michigan City

FRANCISCAN
ST. ELIZABETH HEALTH
Crawfordsville

Rf: NRC Material License No.: 13-19533-01
Control No.: 575080

FRANCISCAN
ST. ELIZABETH HEALTH
Lafayette Central

FRANCISCAN
ST. ELIZABETH HEALTH
Lafayette East

Dear Mr. Mullauer:

FRANCISCAN
ST. JAMES HEALTH
Chicago Heights

As per our phone conversation yesterday, we are providing the following
additional information:

FRANCISCAN
ST. JAMES HEALTH
Olympia Fields

1. Description of the exemption needed and the reason

FRANCISCAN
ST. MARGARET HEALTH
Dyer

We are requesting you grant us the permission to use our existing Cs137
sources (manufacturer Radiation Therapy Resources) for brachy therapy
procedures. We need to provide these procedures for our patients with
early state of gynecological cancer or to give boost dose post external
beam therapy without radiating the dose to extra normal tissue. Brachy
therapy with Cs137 sources using appropriate applicators such as the
Fletcher suit, wang applicator vaginal cylinders of different sizes will
achieve this goal and it will be effective therapy for such patients.

FRANCISCAN
ST. MARGARET HEALTH
Hammond

FRANCISCAN
ST. FRANCIS HEALTH
Beech Grove

FRANCISCAN
ST. FRANCIS HEALTH
Indianapolis

2. Description of Compensating Safety Measures

FRANCISCAN
ST. FRANCIS HEALTH
Mooreville

We received 14 Cs137 sealed sources from Radiation Therapy Resources
on September 18, 1986. These sources are stored in a lead safe in a
specially designed "sources storage room". Sources are color coded with
serial numbers engraved on each source. Safe drawers are also marked
distinctively for the sources strengths stored in each of the drawers. Lead
bricks and L blocks are used to protect the personnel and minimize the
radiation exposure in the surrounding area.

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PHYSICIANS HOSPITAL, LLC
Munster

FranciscanAlliance.org

Only Physicist, Dosimetrist and Radiation Oncologist have access to the
sources. Keys to the source storage room are strictly controlled. The only

other key is with the security of our hospital for emergency situations. Room doors are posted with appropriate Radiation Caution Sign.

We have been doing the quarterly inventory of the sources and radiation surveys outside the safe and all the adjacent areas and keep records. In addition, we perform source leakage tests for source integrity every six months. We found no problems of leakage of any sources.

In addition, we have verified these sources for its activities using a well chamber (model HDR1000Plus) calibrated by Accredited Dosimetry Calibration Lab twice. Once in January 2005 and June 2011 to compare with manufacturer provided values adjusted for decay. The difference we found was no more than about 3 percent.

We have been using the sources for brachy therapy for about the past 25 years and never had any misadministration or medical events. All the required precautions are followed. Radiation surveys are done after sources insertion and removal. Sources are immediately brought to source storage room and transferred to the safe and accounted for.

3. Discussion of Reasonable Alternatives

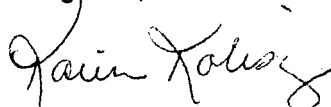
Alternatively, we considered HDR, but cost is prohibitively too high for the volume of procedures we are doing. The cost of HDR is \$250,000 to \$300,000 plus yearly cost of four source exchanges, maintenance and warranty is approximately an additional \$50,000.

The second alternative was to buy new cs137 sources from a current vendor. The cost of new sources would be \$100,000 or more, which would not be offset by our volume of procedures (total procedures from January 2006 to December 2010 was 33), the hospital may decide to get HDR in a few years after we move to a new cancer center within the hospital. In that case, new cs137 sources may not be that useful.

Therefore, we hope and request that the exemption be granted for the benefit of our patients.

If there are any questions, please contact Ram A. Basavatia. His telephone number is 219.757-6285.

Regards,



Karin Kolisz
VP, Clinical Services