

10/17/12

**To:** slong@nationalphysics.com  
**Subject:** Request for additional information in support of Greenbrier Valley Medical Center license renewal

Licensee: Greenbrier Valley Medical Center  
License No. 47-17199-01  
Docket No. 03012343  
Mail Control No. 577920

Ms. Long:

This correspondence is in reference to your application dated July 9, 2012, requesting renewal of Nuclear Regulatory Commission License No. 47-17199-01. In order to continue our review, we need the following additional information:

1. Your application requests that Colin Rose, M.D. be named on your license as an alternate Radiation Safety Officer (RSO). Please note that the NRC does not recognize alternate or assistant RSOs. The individual listed on an NRC license as the RSO is the individual responsible for overseeing the radiation safety program. However, the RSO may delegate certain tasks to other qualified individuals. The RSO must confirm that those delegated tasks are performed as required and in compliance with NRC regulations and your NRC license. No response to this item is required.
2. A list of equipment is attached to your renewal application as item 9.2. It includes a Ludlum Model 3 survey instrument, but does not include the number of survey instruments you have available or model number(s) of any probes you will use. Please provide a list of survey instruments with probes you have available. Additionally, please note that information currently available to the NRC indicates that brachytherapy seeds may become dislodged during implantation or after surgery. Please specify the survey instrument and probe used to locate seeds. This instrument should be equipped with a thin sodium iodide crystal detector probe to easily detect a seed.
3. You have stated in your application that patients administered radioactive materials permitted by 10 CFR 35.300 will be releasable pursuant to 10 CFR 35.75. Please confirm that patients administered radioactive materials permitted by both 10 CFR 35.300 and 10 CFR 35.400 will be releasable pursuant to 10 CFR 35.75. Otherwise, describe the rooms that will be used to house non-releasable patients. Confirm that the patients will be housed in private rooms with private bathroom facilities. Provide room diagrams including adjacent areas on the same floor, areas above and areas below inpatient rooms. Also provide a description of any shielding and show that adequate steps have been taken to ensure that radiation levels will not result in doses to individuals in excess of those specified on 10 CFR 20.1301 when there are inpatients.
4. You have stated that you are not requesting use of 10 CFR 31.11(a) materials (currently listed on your license). Please identify which one of the following applies:
  - a. These materials have never been possessed at your facility, or

- b. These materials have been used previously and are not now in use. If this statement applies, you must submit a closeout survey of the area where material identified in 10 CFR 31.11(a) was used and disposal documentation.
5. Please note that your *"PROCEDURES FOR RADIATION SAFETY DURING IMPLANT THERAPY WHEN USING I-125/Pd-103 SEEDS"* were not required to be submitted and were not reviewed. These procedures will be reviewed during a future inspection.
6. Your renewal application requests that Charles E. Gabe, M.D. be listed as an authorized user on your license. Currently, your license lists Charles E. Gabe, D.O. as an authorized user. Please state whether Dr. Gabe's suffix is *D.O.* or *M.D.*

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 577920. You may also respond via fax to (610) 337-5269, or via email to [lester.tripp@nrc.gov](mailto:lester.tripp@nrc.gov). If you have any technical questions regarding this deficiency letter, please me at (610) 337-5358.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Please note that the office of the Region I Division of Nuclear Materials Safety has moved effective May 9, 2012. Our new address is:

U. S. Nuclear Regulatory Commission  
Region I  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Sincerely,

**/RA/**

Lester Tripp  
Health Physicist  
Medical Branch  
Division of Nuclear Materials Safety