

From: Sater, John (NIH/NCI) [C]
To: [Reichard, Michael](#)
Cc: [Moore, Jerry \(NIH/NCI\) \[C\]](#)
Subject: [External_Sender] Attachment for Amendment to 19-21091-01
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Attachments: [Pages from Effluent Monitor Calibration Frequency Change 3-23-18.pdf](#)

The attachment that the cover letter was referring to was page 2 titled **Item 9: Facilities and Equipment** and I have attached it in case it is missing. Please let me know if you need anything else.

Thank you,

John Sater [C]
Associate Safety Officer
Radiation Safety Office, Environment, Health, and Safety
Frederick National Laboratory for Cancer Research
Leidos Biomedical Research, Inc.
Post Office Box B
Frederick, MD 21702
Phone: (301)846-7336
Fax: (301)846-6619
email: John.Sater@fnlcr.nih.gov

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Item 9: Facilities and Equipment

In reply to question #7 in the Technical Review Questions, we replied that “the monitoring systems would be calibrated by the manufacturer or authorized service representative annually.”

We now have 6 separate units and are changing the calibration frequency to every 3 years (2 units each year) and will be performing weekly consistency checks using a solid source (i.e. Cs-137) as well as performing a validation/calibration of the stack flow monitors annually. The manufacturer has agreed that this is an appropriate method/frequency for these CMS PET units.

The current procedure requires the release of a known amount of Kr-85 gas. As we now have six separate monitoring units we are making this change to minimize releases of radioactive materials to the environment and reduce the hazards involved with working with compressed radioactive gases.

The manufacturers own internal procedures used an initial testing with C-11 gas and then cross referenced the results to a Cs-137 solid source which was used to determine the efficiency and correction factor for each individual unit.

Calibrations will be performed either by the manufacturer, their authorized service representative or by our Radiation Safety Office using procedures approved by the Radiation Safety Officer.