Medical Center

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Portland Division 3710 Southwest U.S. Veterans Hospital Road P.O. Box 1034 Portland OR 97207

Administration

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in Reply Refer To: 648/115P

U. S. Nuclear Regulatory Commission, Region V Material Licensing Branch 1450 Maria Lane, Suite 210 Walnut Creek, CA 94596

THRU: Director, Nuclear Medicine Service (115) VA Central Office 810 Vermont Avenue NW Washington, D.C. 20420

SUBJ: AMENDMENT OF LICENSE #36-01395-01

1. The Veterans Administration Medical Center, Portland, Oregon (NRC license #36-01395-01, Reference #030-02935) wishes to amend its NRC license in two matters. These are as follows:

A. We request that we be allowed to dispose of our 125-lodine waste in the form of solids and precipitates in the bottom of tubes from our radioimmunoassay lab by holding them for a minimum of five half-lives, then monitoring them with a radiation detection survey meter set on its most sensitive scale, and with no shielding interposed to determine that its radioactivity cannot be distinguished from the background radiation level. If the latter holds true, the material will be placed in disposal in its trash path.

The basis of this request is as follows:

10 CFR, Part 31.11 allows the issuance of a general license to a laboratory if certain conditions are met. These allow the use of 125-lodine in prepackaged units not to exceed 10 microCuries each for use in in vitro or clinical laboratory tests, not involving internal or external administration to humans or animals. Also, the total amount of 125-lodine, 131-lodine, 75-Se, and/or 59-Fe on hand at any one time is not to exceed 200 microCuries. Based on an analysis of six months of receipt and disposal records from our radioimmunoassay lab, we receive approximately 800 microCuries per month of 125-lodine in kit form, and generate less than 300 microCuries per month in solid waste. By waiting a period of five half-lives before the disposal of any solid 125-lodine waste from our radioimmunoassay lab, we would be disposing of quantities much less than those allowed by license issued under 10 CFR 31.11. Furthermore, it would free up valuable storage space in our long term storage area. This request for amendment only concerns solid 125-lodine waste from radioimmunoassays.

B. We also request that our license be amended to allow use of radioactive materials for research purposes at our Vancouver, Washington facility. Users of radioactive materials for research purposes at Vancouver will meet the same criteria as those at the Portland facility. Some specific items of these criteria include:

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- 1'. It terial shall be used only by or under the supervision of authorized users approved by our Radiation Safety Committee.
 - 2'. Radioactive materials used at Vancouver must be secured at all times when not in direct attendance by the authorized user or his staff. Laboratory areas will be surveyed at least monthly by the Radiation Safety Officer or his designee. If the laboratory area uses quantities of radioactive material of greater than 200 microCuries per month, then the area surveys will be done weekly, either by the Radiation Safety Officer, or by the authorized user or his staff. In any case, the Radiation Safety Officer will make monthly surveys.
 - 3'. As part of the review of requests for authorization, the Radiation Safety Committee will insure that the authorized user who proposes to use materials in Vancouver will have suitable radiation detection equipment available to perform required surveys. Attached is a diagram of the area of use proposed by the one person thusfar authorized (subject to NRC approval for use in Vancouver) by our Radiation Safety Committee. This would be a "typical" area of use.

2. Your consideration in this matter is appreciated. Should you have any questions regarding this matter, please contact our radiation safety officer, William K. Tuttle III, Ph.D. at (503) 22D-8262, Ext. 5853 (commercial) or 424-5853 (FTS).

BARRY L BELL

Medical Center Director

