

### APPLICATION FOR MATERIAL LICENSE

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

**APPLICATIONS FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:**

U.S. NUCLEAR REGULATORY COMMISSION  
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY, NMSS  
WASHINGTON, DC 20545

**ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS, IF YOU ARE LOCATED IN:**

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION I  
NUCLEAR MATERIALS SAFETY SECTION B  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PA 19406

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION II  
NUCLEAR MATERIALS SAFETY SECTION  
101 MARIETTA STREET, SUITE 2800  
ATLANTA, GA 30323

**IF YOU ARE LOCATED IN:**

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION III  
MATERIALS LICENSING SECTION  
799 ROOSEVELT ROAD  
GLEN ELLYN, IL 60137

ARKANSAS, COLORADO, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, SOUTH DAKOTA, TEXAS, UTAH, OR WYOMING, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION IV  
MATERIAL RADIATION PROTECTION SECTION  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TX 76011

ALASKA, ARIZONA, CALIFORNIA, HAWAII, NEVADA, OREGON, WASHINGTON, AND U.S. TERRITORIES AND POSSESSIONS IN THE PACIFIC, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION V  
NUCLEAR MATERIALS SAFETY SECTION  
1450 MARIA LANE, SUITE 210  
WALNUT CREEK, CA 94665

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTION.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- A. NEW LICENSE
- B. AMENDMENT TO LICENSE NUMBER \_\_\_\_\_
- C. RENEWAL OF LICENSE NUMBER 22-20451-01

2. NAME AND MAILING ADDRESS OF APPLICANT (include Zip Code)

Sioux Valley Hospital  
1324 Fifth Street North  
P.O. Box 577  
New Ulm, MN 56073

3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED.

Sioux Valley Hospital  
1324 Fifth Street North  
P.O. Box 577  
New Ulm, MN 56073

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Mary Sydow / R.H. VanWyngharden, D.O.

TELEPHONE NUMBER

507-354-2111, ext. 154

SUBMIT ITEMS 5 THROUGH 11 ON 8 1/2 x 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number, b. chemical and/or physical form, and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSEE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY 7C AMOUNT ENCLOSED \$ 580.00

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, AND 40 AND THAT ALL INFORMATION CONTAINED HEREIN, IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948, 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

SIGNATURE—CERTIFYING OFFICER

TYPED/PRINTED NAME

TITLE

DATE

*Dianne Eibner*

Dianne Eibner

Director of Patient Care

12-13-88

9001250421 ~~800829~~  
REG LIC30  
22-20451-01 PDR

RECEIVED

FOR NRC USE ONLY 23 1988

TYPE OF FEE <i>Rw</i>	FEE CODE <i>LW1</i>	FEE CATEGORY <i>7C</i>	COMMENTS REGION III	APPROVED BY <i>CP</i>
AMOUNT RECEIVED <i>\$580</i>	CHECK NUMBER <i>023521</i>	CONTROL NO. 86602		DATE <i>DEC 23 1988</i>

## PRIVACY ACT STATEMENT

Pursuant to 5 U.S.C. 552a(e)(3), enacted into law by section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission on NRC Form 313. This information is maintained in a system of records designated as NRC-3 and described at 40 Federal Register 45334 (October 1, 1975).

1. **AUTHORITY:** Sections 81 and 161(b) of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2111 and 2201(b)).
2. **PRINCIPAL PURPOSE(S):** The information is evaluated by the NRC staff pursuant to the criteria set forth in 10 CFR Parts 30, 32, 33, 34, 35 and 40 to determine whether the application meets the requirements of the Atomic Energy Act of 1954, as amended, and the Commission's regulations, for the issuance of a radioactive material license or amendment thereof.
3. **ROUTINE USES:** The information may be (a) provided to State health departments for their information and use; and (b) provided to Federal, State, and local health officials and other persons in the event of incident or exposure, for their information, investigation, and protection of the public health and safety. The information may also be disclosed to appropriate Federal, State, and local agencies in the event that the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, or local agency to the extent relevant and necessary for an NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you.
4. **WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION:** Disclosure of the requested information is voluntary. If the requested information is not furnished, however, the application for radioactive material license, or amendment thereof, will not be processed. A request that information be held from public inspection must be in accordance with the provisions of 10 CFR 2.790. Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned need to inspect the document.
5. **SYSTEM MANAGER(S) AND ADDRESS:** U.S. Nuclear Regulatory Commission  
Director, Division of Fuel Cycle and Material Safety  
Office of Nuclear Material Safety and Safeguards  
Washington, D.C. 20555

CONTROL NO 86602

REF: NRC 313 - ITEMS 5 AND 6

<u>ITEM 5 - BYPRODUCT MATERIALS</u>	<u>AMOUNT</u>	<u>ITEM 6 - PURPOSE</u>
a) Material in 35.100	As needed	Medical Use
b) Material in 35.200	As needed	Medical Use
c) Material in 35.300	As needed	Medical Use Iodine-131 as iodide for treatment of hyper- thyroidism, cardiac dysfunction and thyroid carcinoma

CONTROL NO 86602

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REF: NRC 313 - ITEM 8

PERSONNEL TRAINING PROGRAM

We will establish and implement the model training program that was published in Appendix A to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 9.2

CALIBRATION OF SURVEY METERS

We will establish and implement the model training program that was published in Appendix A to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 9.3

PROCEDURE FOR CALIBRATING DOSE CALIBRATOR

We will establish and implement the model procedure for calibrating our dose calibrator that was published in Appendix C to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 9.4

PERSONNEL MONITORING

We will establish and implement the model personnel external exposure monitoring program published in Appendix D to Regulatory Guide 10.8, Revision.

CONTROL NO 86602



REF: NRC 313 - ITEM 9.5

TRANSPORTING OF IMAGING EQUIPMENT

Not applicable.

REF: NRC 313 - ITEM 10.1

RADIATION SAFETY COMMITTEE

We will establish and implement the model procedures for establishing and operating a Radiation Safety Committee that was published in Appendix F to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.2

ALARA

We will establish and implement the model ALARA program that was published in Appendix G to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.3

LEAK TEST PROCEDURES

We will establish and implement the model procedure for leak-testing sealed sources that was published in in Appendix H to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.4

SAFE USE OF RADIOACTIVE PHARMACEUTICALS

We will establish and implement the model safety rules published in Appendix I to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.5

SPILL PROCEDURES

We will establish and implement the model spill procedures published in Appendix J to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.6

ORDERING AND RECEIVING OF RADIOACTIVE MATERIALS

We will establish and implement the model guidance for ordering and receiving radioactive material that was published in Appendix K to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.7

OPENING PACKAGES CONTAINING RADIOACTIVE MATERIALS

We will establish and implement the model procedure for opening packages that was published in Appendix L to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.8

M.1 RECORDS OF UNIT DOSAGE USE

We will establish and implement the model procedure for a unit dosage record system that was published in Appendix M.1 to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.9

M.2 RECORDS OF MULTIDOSE VIAL USE

We will establish and implement the model procedure for a multidose vial record system that was published in Appendix M.2 to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.10

MO-99 CONCENTRATION RECORDS

We will establish and implement the model procedure for measuring and recording Molybdenum concentration that was published in Appendix M.3 to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.11

IMPLANT SOURCE USE RECORDS

Not applicable.



REF: NRC 313 - ITEM 10.12

AREA SURVEY PROCEDURES

We will establish and implement the model procedure for area surveys that was published in Appendix N to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.13

AIR CONCENTRATION CONTROL (XE-133)

Not Applicable

REF: NRC 313 - ITEM 10.13.2

WORKER DOSE FROM AEROSOLS

We will use single use Radioaerosol delivery systems. We will establish and implement the model procedure for calculating worker dose from aerosols that was published in Appendix O.1 to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.13.4

SPIILLED GAS CLEARANCE TIME

Not Applicable

REF: NRC 313 - ITEM 10.14

RADIOPHARMACEUTICAL THERAPY

We will establish and implement the model procedure for radiation safety during radiopharmaceutical therapy that was published in Appendix P to Regulatory Guide 10.8, Revision 2.

REF: NRC 313 - ITEM 10.15

IMPLANT SURGERY

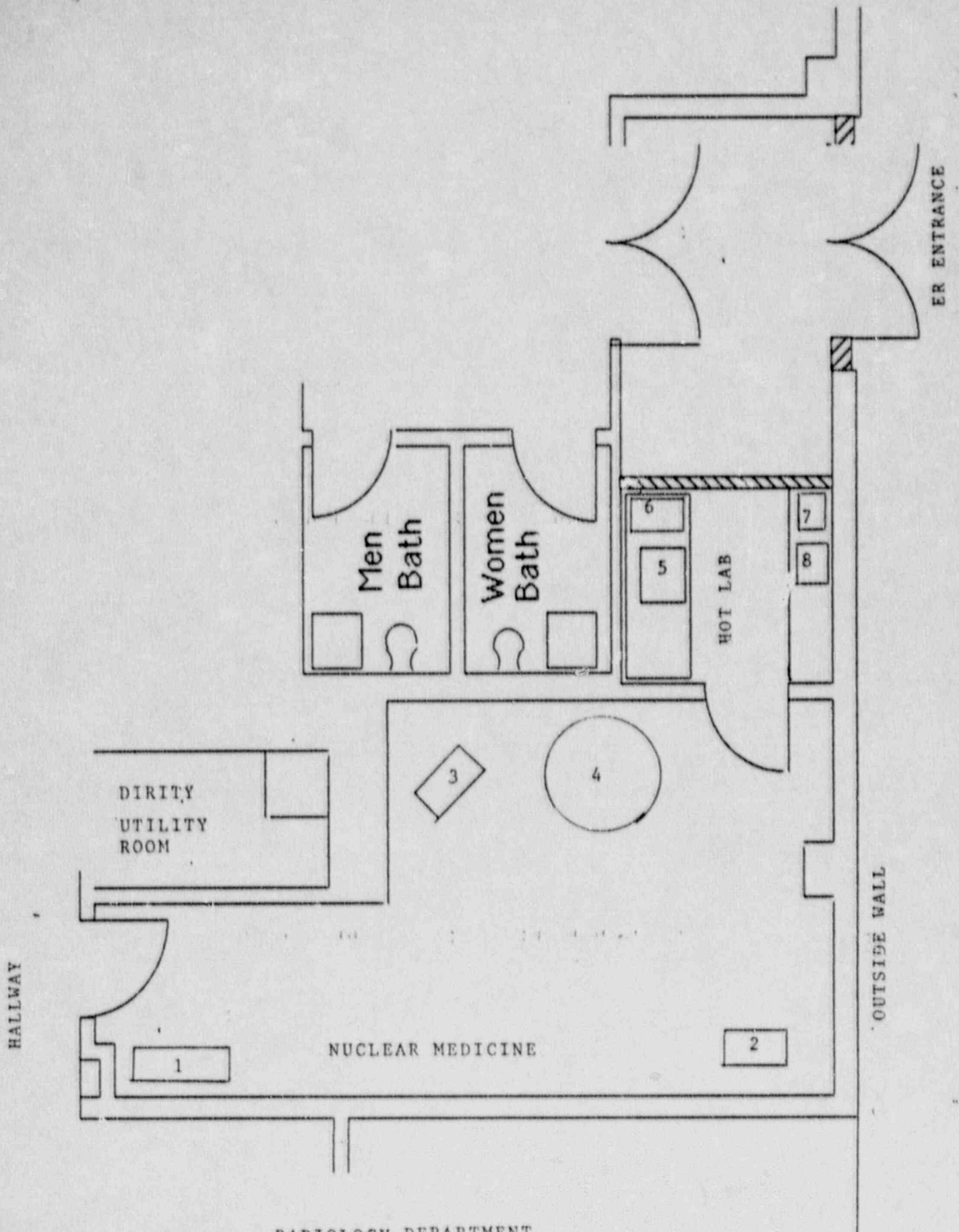
Not applicable.

REF: NRC 313 - ITEM 11.1

WASTE DISPOSAL

We will establish and implement the general guidance and model procedures for waste disposal that were published in Appendix R to Regulatory Guide 10.8, Revision 2.

NORTH



RADIOLOGY DEPARTMENT

1/4"=1 foot



KEY

1. Desk
2. Scaler/Thyroid Probe
3. Camera Console
4. Detector
5. Sink
6. Decay - With Lead Blocks
7. Lead Glass Shield
8. Generator With Lead Blocks and Shield

ATT 7.1.0

AUTHORIZED USER(S)

<u>NAME</u>	<u>AUTHORIZED USE</u>
Radiation Safety Officer	Item 5 a)
Ray H. VanWyngarden, D.O.	b)
	c)

For training and experience of the above doctor, please reference  
Sioux Valley Hospital, New Ulm, Minnesota, NRC Radioactive Materials  
License #22-20451-01.

ATT 8.1

WORKERS RECEIVING TRAINING AS STATED IN APPENDIX A

Nuclear Medicine Personnel

Radiology Personnel

Housekeeping Personnel

Nursing Personnel

Security Personnel, who are responsible for the off-duty hour receipt of radioactive materials.

Training will be in the form of lectures, demonstrations, slide presentations, and written instructions.



## Procedure for Radiation Safety During Iodine Therapy Over 30 Millicuries

1. The patient's room will be as far away from the nursing station and heavy traffic hallways as is consistent with good medical care. It will be a private room with private sanitary facilities and should be without carpet.
2. Prepare the room for the procedure as follows:
  - a) Use leak-proof absorbent paper to cover large surfaces (the bed, chairs, and the floor around the toilet) that are likely to be contaminated. Small items (telephone, door knobs, bed remote control, television control, and nurse call cord) may be covered with absorbent paper or plastic bags.
  - b) Prepare separate boxes for linen, disposable waste, and non-disposable contaminated items. Place a single large re-closable plastic bag in each box, or supply several small plastic bags.
  - c) Urine will be discarded by release to the sanitary sewer.
  - d) Stock additional disposable gloves, absorbent paper, and radioactive waste labels in the room for use as necessary by Nursing, Nuclear Medicine, and radiation safety personnel.
3. Order disposable table service for the duration of the patient's stay. Inform the Housekeeping Office that personnel should stay out of the room until otherwise notified.
4. Supply the nurses with film badges, TLDs, or pocket ionization chambers.
5. Brief the nurses on radiation safety precautions. Use the form (attached), "Nursing Instructions for Patients Treated with Iodine-131". Allow time for questions and answers during the briefing. Leave a written copy of the radiation safety precautions in the patient's chart or at the nurses' station.
6. Brief the patient on radiation safety procedures for the dosage administration, visitor control, radioactive waste, and other items as applicable.
7. Only those persons needed for medical, safety, or training purposes should be present during the administration.
8. Mark a visitors' "safe line" on the floor with tape as far from the patient as possible.
9. Following administration of the dosage, measure the exposure rate in mR/hr at bedside, at 1 meter from bedside, at the visitors' "safe line", and in

the surrounding hallways and rooms. Record this and any other necessary information on the nursing instructions form or the nurses' dosimeter signout form. Post the room with a "Radioactive Materials" sign.

10. For patients treated with liquid I-131, 1 day after the dosage administration, measure the thyroid burden of all personnel who were present for the administration. Also consider a thyroid burden assay for patient care personnel 2 days after the administration. Make a record of the worker's name, amount of I-131 activity in a thyroid phantom in microcuries and associated counts per minute, the counts per minute from the worker's thyroid, the calculated thyroid burden, and date.
11. As the therapy proceeds, pick-up waste for transfer to a decay-in-storage or decontamination area.
12. Do not release any patient until either the exposure rate from the patient is less than 5 millirem per hour at 1 meter or the retained radioactivity is less than 30 millicuries. If you use the exposure rate standard as the release criterion, measure it with a radiation measurement survey meter at a distance of 1 meter from the umbilicus while the patient is standing or, if the patient is not ambulatory, 1 meter from the bedside with the patient supine.
13. Before using the room for general occupancy, it must be decontaminated and released to the Admitting Office.
  - a) Remove all absorbent paper, and place it in the appropriate container.
  - b) Transfer all containers to a decay-in-storage or decontamination area.
  - c) Use a radiation detection survey meter to check for room contamination. Clean contaminated areas until removable contamination is less than 200 dpm per 100 square centimeters.
  - d) Call the Housekeeping Office to remove the cleaning restriction and call the Admitting Office to return the room to the vacant list.

The "Radiation Safety Checklist for Iodine Therapy Over 30 Millicuries" (attached) will also be used.

NURSING INSTRUCTIONS FOR PATIENTS TREATED WITH IODINE-131

Patient Name: \_\_\_\_\_ Patient Number: \_\_\_\_\_  
 Attending: \_\_\_\_\_ Phone: \_\_\_\_\_ Pager: \_\_\_\_\_ Patient Room: \_\_\_\_\_

Dose: \_\_\_\_\_ mCi of \_\_\_\_\_ as \_\_\_\_\_ was administered at \_\_\_\_\_:\_\_\_\_:\_\_\_\_  
 Signature: \_\_\_\_\_ Date: \_\_\_\_\_

RADIATION EXPOSURE RATES

Unrestricted areas: Door \_\_\_\_\_ mR/hr; rm \_\_\_\_\_ mR/hr; rm \_\_\_\_\_ mR/hr  
 Patient supine in bed or \_\_\_\_\_

Date	Time	Bedside	3 ft from bed	Door	_____
____-____-____	____:____ <sup>PM</sup>	_____ mR/hr	_____ mR/hr	_____ mR/hr	_____ mR/hr
____-____-____	____:____ <sup>PM</sup>	_____ mR/hr	_____ mR/hr	_____ mR/hr	_____ mR/hr
____-____-____	____:____ <sup>PM</sup>	_____ mR/hr	_____ mR/hr	_____ mR/hr	_____ mR/hr
____-____-____	____:____ <sup>PM</sup>	_____ mR/hr	_____ mR/hr	_____ mR/hr	_____ mR/hr
____-____-____	____:____ <sup>PM</sup>	_____ mR/hr	_____ mR/hr	_____ mR/hr	_____ mR/hr
____-____-____	____:____ <sup>PM</sup>	_____ mR/hr	_____ mR/hr	_____ mR/hr	_____ mR/hr

INSTRUCTIONS

Visitor Restrictions:

- No visitors.
- No visitors under 18 or pregnant.
- \_\_\_\_\_ minutes each day maximum for each visitor.
- Visitors must stay behind line on floor at all times.

Nursing Restrictions:

- Patient is restricted to room.
- No nurses who are pregnant may render care.
- \_\_\_\_\_ minutes each day per nurse in the room.

Patient Care:

- Wear disposable gloves. Wash your hands after caring for patient.
- Discard linen, bedclothes, plates, utensils, dressings, etc., in boxes in each room.
- Collect urine in containers provided. Discard feces in toilet.
- Discard urine and feces in toilet. Flush three times.
- Housekeeping personnel are not permitted in the room.
- Only RSO may release room to admitting office.
- Wear your radiation monitor when caring for patient. Leave at nursing station at the end of your shift. You may use the same monitor on your next shift. Do not share. Call RSO for additional monitors if needed.

\_\_\_\_\_  
 \_\_\_\_\_

In case of emergency, or if you have a question, call:

RSO: \_\_\_\_\_ Work: \_\_\_\_\_ Home: \_\_\_\_\_ Pager: \_\_\_\_\_  
 MD: \_\_\_\_\_ Work: \_\_\_\_\_ Home: \_\_\_\_\_ Pager: \_\_\_\_\_



RADIATION SAFETY CHECKLIST FOR  
IODINE THERAPY OVER 30 MILLICURIES

Patient: \_\_\_\_\_ Room: \_\_\_\_\_ Date: \_\_\_\_\_

PREPARATION

- Schedule a private room, with private sanitary facilities and without carpet, in a low traffic area.
- Cover large room surfaces with absorbent paper and small surfaces with absorbent paper or plastic bags.
- Prepare labeled boxes for used linen, disposable waste, and non-disposable contaminated items.
- Prepare urine collection containers if urine will be collected.
- Stock room with disposable gloves, absorbent paper, and "radioactive waste" labels.
- Mark a visitors' "safe line" on the floor.
- Order disposable table service.
- Notify Housekeeping to not clean the room until further notice.
- Brief the nursing staff on radiation safety measures.
- Supply the nursing staff with personnel radiation dosimeters.

ADMINISTRATION

- Clear the room of unneeded personnel.
- Brief the patient on the clinical procedure.
- Administer the dosage.
- Measure dose rates at bedside, 1 meter from bedside, visitors' "safe line", and surrounding hallways and rooms.
- Post the room with a "Radioactive Materials" sign.

FOLLOW-UP

- Measure the thyroid burden of all personnel who were present for the administration.
- Pick up waste for decay-in-storage or decontamination.
- Release the patient.
- Decontaminate and survey the room. Remove the "Radioactive Materials" sign.
- Call the Housekeeping Office to clean the room.

NURSING INSTRUCTIONS FOR PATIENTS RECEIVING RADIOTHERAPEUTIC DOSES  
LESS THAN 30 MILLICURIES

A. OUT PATIENTS:

Patients may be treated as Out Patients and released after administration of radio-therapeutic doses less than 30 millicuries.

B. IN PATIENTS:

If a patient is admitted to the hospital, there will be no restrictions regarding nursing care, visitors, and bathroom privileges.

However, the following procedures should be followed:

1. Patients using non-disposable urinal or bedpan:

- a) Gloves should be worn when handling urinal and bedpan.
- b) Dispose of excreta in toilet, flushing three (3) times.
- c) Clean bedpan in routine manner.
- d) Rinse urinal, filling with hot water three (3) times.
- e) Keep urinal and bedpan at patient's bedside until patient is discharged.
- f) The Radiation Safety Officer, or his delegate, will survey urinal and bedpan prior to this equipment being issued to other areas.

2. Patients using disposable urinal or bedpan:

- a) The R.S.O., or his delegate, will survey disposable urinal and/or bedpan before disposal, to insure background exposure limits.

3. If patient should soil self and/or bed with vomitus, feces, or urine:

- a) Notify the R.S.O.
- b) Wear gloves to handle all soiled material.
- c) Contain all non-absorbed liquid material with absorbable disposable material.
- d) Store all soiled material in plastic bag for monitoring by R.S.O. prior to disposal.

RADIATION SAFETY OFFICER:

On Duty Phone:

Off Duty Phone:

EXHIBIT P

For therapy patients who have received less than 30 mCi and do not require hospitalization because of the amount of radioactive material present, for those patients we will follow the attached nursing instructions, "Nursing Instructions for Patients Receiving Radiotherapeutic Doses Less than 30 Millicuries".



APPENDIX G

Model Program for Maintaining Occupational Radiation Exposure  
at Medical Institutions ALARA  
(See § 35.20.)

You may use the text as it appears here, saying on your application, "We will establish and implement the model ALARA program that was published in Appendix G to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own ALARA program for NRC review. If you do so, you should consider for inclusion all the features in the model and carefully review the requirements of § 35.20. Say on your application, "We have developed an ALARA program for your review that is appended as ATT 10.2," and append your program.

ALARA PROGRAM

Sioux Valley Hospital  
\_\_\_\_\_  
(Licensee's Name)

December 1988  
\_\_\_\_\_  
(Date)

1. Management Commitment

- a. We, the management of this (medical facility, hospital, etc.), are committed to the program described herein for keeping individual and collective doses as low as is reasonably achievable (ALARA). In accord with this commitment, we hereby describe an administrative organization for radiation safety and will develop the necessary written policy, procedures, and instructions to foster the ALARA concept within our institution. The organization will include a Radiation Safety Committee (RSC) and a Radiation Safety Officer (RSO).
- b. We will perform a formal annual review of the radiation safety program, including ALARA considerations. This will include reviews of operating procedures and past dose records, inspections, etc., and consultations with the radiation safety staff or outside consultants.
- c. Modifications to operating and maintenance procedures and to equipment and facilities will be made if they will reduce exposures unless the cost, in our judgment, is considered to be unjustified. We will be able to demonstrate, if necessary, that improvements have been sought, that modifications have been considered, and that they have been implemented when reasonable. If modifications have been recommended but not implemented, we will be prepared to describe the reasons for not implementing them.
- d. In addition to maintaining doses to individuals as far below the limits as is reasonably achievable, the sum of the doses received by all exposed individuals will also be maintained at the lowest practicable.

level. It would not be desirable, for example, to hold the highest doses to individuals to some fraction of the applicable limit if this involved exposing additional people and significantly increasing the sum of radiation doses received by all involved individuals.

## 2. Radiation Safety Committee

### a. Review of Proposed Users and Uses

- (1) The RSC will thoroughly review the qualifications of each applicant with respect to the types and quantities of materials and methods of use for which application has been made to ensure that the applicant will be able to take appropriate measures to maintain exposure ALARA.
- (2) When considering a new use of byproduct material, the RSC will review the efforts of the applicant to maintain exposure ALARA.
- (3) The RSC will ensure that the users justify their procedures and that individual and collective doses will be ALARA.

### b. Delegation of Authority

(The judicious delegation of RSC authority is essential to the enforcement of an ALARA program.)

- (1) The RSC will delegate authority to the RSO for enforcement of the ALARA concept.
- (2) The RSC will support the RSO when it is necessary for the RSO to assert authority. If the RSC has overruled the RSO, it will record the basis for its action in the minutes of the quarterly meeting.

### c. Review of ALARA Program

- (1) The RSC will encourage all users to review current procedures and develop new procedures as appropriate to implement the ALARA concept.
- (2) The RSC will perform a quarterly review of occupational radiation exposure with particular attention to instances in which the investigational levels in Table 1 are exceeded. The principal purpose of this review is to assess trends in occupational exposure as an index of the ALARA program quality and to decide if action is warranted when investigational levels are exceeded (see Section 6 below for a discussion of investigational levels).\*

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\*The NRC has emphasized that the investigational levels in this program are not new dose limits but, as noted in ICRP Report 26, "Recommendations of the International Commission on Radiological Protection," serve as check points above which the results are considered sufficiently important to justify investigations.

Table 1  
Investigational Levels

	Investigational Levels (mrems per calendar quarter)	
	Level I	Level II
1. Whole body; head and trunk; active blood-forming organs; lens of eyes; or gonads	125	375
2. Hands and forearms; feet and ankles	1875	5625
3. Skin of whole body*	750	2250

\*Not normally applicable to medical use operations except those using significant quantities of beta-emitting isotopes.

(3) The RSC will evaluate our institution's overall efforts for maintaining doses ALARA on an annual basis. This review will include the efforts of the RSO, authorized users, and workers as well as those of management.

3. Radiation Safety Officer

a. Annual and Quarterly Review

- (1) Annual review of the radiation safety program. The RSO will perform an annual review of the radiation safety program for adherence to ALARA concepts. Reviews of specific methods of use may be conducted on a more frequent basis.
- (2) Quarterly review of occupational exposures. The RSO will review at least quarterly the external radiation doses of authorized users and workers to determine that their doses are ALARA in accordance with the provisions of Section 6 of this program and will prepare a summary report for the RSC.
- (3) Quarterly review of records of radiation surveys. The RSO will review radiation surveys in unrestricted and restricted areas to determine that dose rates and amounts of contamination were at ALARA levels during the previous quarter and will prepare a summary report for the RSC.

b. Education Responsibilities for ALARA Program

- (1) The RSO will schedule briefings and educational sessions to inform workers of ALARA program efforts.



- (2) The RSO will ensure that authorized users, workers, and ancillary personnel who may be exposed to radiation will be instructed in the ALARA philosophy and informed that management, the RSC, and the RSO are committed to implementing the ALARA concept.

c. Cooperative Efforts for Development of ALARA Procedures

Radiation workers will be given opportunities to participate in formulating the procedures that they will be required to follow.

- (1) The RSO will be in close contact with all users and workers in order to develop ALARA procedures for working with radioactive materials.
- (2) The RSO will establish procedures for receiving and evaluating the suggestions of individual workers for improving health physics practices and will encourage the use of those procedures.

d. Reviewing Instances of Deviation from Good ALARA Practices

The RSO will investigate all known instances of deviation from good ALARA practices and, if possible, will determine the causes. When the cause is known, the RSO will implement changes in the program to maintain doses ALARA.

4. Authorized Users

a. New Methods of Use Involving Potential Radiation Doses

- (1) The authorized user will consult with the RSO and/or RSC during the planning stage before using radioactive materials for new uses.
- (2) The authorized user will review each planned use of radioactive materials to ensure that doses will be kept ALARA. Trial runs may be helpful.

b. Authorized User's Responsibility to Supervised Individuals

- (1) The authorized user will explain the ALARA concept and the need to maintain exposures ALARA to all supervised individuals.
- (2) The authorized user will ensure that supervised individuals who are subject to occupational radiation exposure are trained and educated in good health physics practices and in maintaining exposures ALARA.

5. Individuals Who Receive Occupational Radiation Doses

a. Workers will be instructed in the ALARA concept and its relationship to work procedures and work conditions.

b. Workers will be instructed in recourses available if they feel that ALARA is not being promoted on the job.

6. Establishment of Investigational Levels in Order to Monitor Individual Occupational External Radiation Doses

This institution hereby establishes investigational levels for occupational external radiation doses which, when exceeded, will initiate review or investigation by the RSC and/or the RSO. The investigational levels that we have adopted are listed in Table 1. These levels apply to the exposure of individual workers.

The RSO will review and record on Form NRC-5, "Current Occupational External Radiation Exposures," or an equivalent form (e.g., dosimeter processor's report) results of personnel monitoring not less than once in any calendar quarter as required by § 20.401 of 10 CFR Part 20. The following actions will be taken at the investigational levels as stated in Table 1:

a. Personnel dose less than Investigational Level I.

Except when deemed appropriate by the RSO, no further action will be taken in those cases where an individual's dose is less than Table 1 values for the Investigational Level I.

b. Personnel dose equal to or greater than Investigational Level I but less than Investigational Level II.

The RSO will review the dose of each individual whose quarterly dose equals or exceeds Investigational Level I and will report the results of the reviews at the first RSC meeting following the quarter when the dose was recorded. If the dose does not equal or exceed Investigational Level II, no action related specifically to the exposure is required unless deemed appropriate by the Committee. The Committee will, however, review each such dose in comparison with those of others performing similar tasks as an index of ALARA program quality and will record the review in the Committee minutes.

c. Personnel dose equal to or greater than Investigational Level II.

The RSO will investigate in a timely manner the causes of all personnel doses equaling or exceeding Investigational Level II and, if warranted, will take action. A report of the investigation, any actions taken, and a copy of the individual's Form NRC-5 or its equivalent will be presented to the RSC at its first meeting following completion of the investigation. The details of these reports will be included in the RSC minutes.

d. Reestablishment of investigational levels to levels above those listed in Table 1.

In cases where a worker's or a group of workers' doses need to exceed an investigational level, a new, higher investigational level may be established for that individual or group on the basis that it is consistent with good ALARA practices. Justification for new investigational levels will be documented.

The RSC will review the justification for and must approve or disapprove all revisions of investigational levels.

7. Signature of Certifying Official\*

I hereby certify that this institution has implemented the ALARA Program set forth above.

Dianne Eibner  
Signature

Dianne Eibner  
Name (print or type)

Director of Patient Care  
Title

\*The person who is authorized to make commitments for the administration of the institution (e.g., hospital administrator).



## APPENDIX A

### Model Training Program (See §§ 19.12 and 35.21)

The following guidance may be used to develop a training program. If you use the frequency and subject listings to develop your training program, you may say on your application, "We will establish and implement the model training program that was published in Appendix A to Regulatory Guide 10.8, Revision 2, and have appended a table ATT 8.1 that identifies the groups of workers who will receive training and the method and frequency of training." You may use lectures, video-taped presentations, or demonstrations, for example, as methods of training.

If you prefer, you may develop your own training program for review. If you do so, you should consider for inclusion all the features in the model program and carefully review the requirements of § 19.12. Say on your application, "We have developed a training program for your review that is appended as ATT 8.1." Be sure to include the table that identifies groups of workers, the method of their training, and the frequency of training.

It may not be assumed that safety instruction has been adequately covered by prior occupational training, board certification, etc. Site-specific training should be provided for all workers. Ancillary personnel (e.g., nursing, clerical, housekeeping, security) whose duties may require them to work in the vicinity of radioactive material (whether escorted or not) need to be informed about radiation hazards and appropriate precautions. All training should be tailored to meet the needs of the individuals in attendance. A training program that provides necessary instruction should be written and implemented.

#### MODEL PROGRAM

Personnel will be instructed:

1. Before assuming duties with, or in the vicinity of, radioactive materials.
2. During annual refresher training.
3. Whenever there is a significant change in duties, regulations, or the terms of the license.

Instruction for individuals in attendance will include the following subjects:

1. Applicable regulations and license conditions.
2. Areas where radioactive material is used or stored.
3. Potential hazards associated with radioactive material in each area where the employees will work.
4. Appropriate radiation safety procedures.
5. Licensee's in-house work rules.

6. Each individual's obligation to report unsafe conditions to the Radiation Safety Officer.
7. Appropriate response to emergencies or unsafe conditions.
8. Worker's right to be informed of occupational radiation exposure and bioassay results.
9. Locations where the licensee has posted or made available notices, copies of pertinent regulations, and copies of pertinent licenses and license conditions (including applications and applicable correspondence), as required by 10 CFR Part 19.
10. Question and answer period.

## APPENDIX B

### Model Procedure for Calibrating Survey Instruments (See § 35.51.)

You or your contractor may use the following guidance to calibrate survey instruments. If you, or the contractor, follow all the guidance, you may say on your application, "We will establish and implement the model procedure for calibrating survey instruments that was published in Appendix B to Regulatory Guide 10.8, Revision 2."

If your procedure does not follow the guidance in the model, you may develop your own procedure for review. If you do so, you should consider for inclusion all the features in the model and carefully review the requirements of § 35.51. Say on your application, "We have developed a survey instrument calibration procedure for your review that is appended as ATT 9.2," and append your survey instrument calibration procedure.

Radiation survey meters should be calibrated with a radioactive source. Electronic calibrations alone are not acceptable. Survey meters must be calibrated at least annually and after servicing. (Battery changes are not considered "servicing.")

#### MODEL PROCEDURE

1. The source must be approximately a point source.
2. Either the apparent source activity or the exposure rate at a given distance must be traceable by documented measurements to a standard certified within 5 percent accuracy by the National Bureau of Standards.
3. A source that has approximately the same photon energy as the environment in which the calibrated device will be employed should be used for the calibration.
4. The source should be of sufficient strength to give an exposure rate of about 30 mR/hr at 100 cm. Minimum activities of typical sources are 85 millicuries of Cs-137 or 21 millicuries of Co-60.
5. The inverse square law and the radioactive decay law must be used to correct for change in exposure rate due to changes in distance or source decay.
6. A record must be made of each survey meter calibration.
7. A single point on a survey meter scale may be considered satisfactorily calibrated if the indicated exposure rate differs from the calculated exposure rate by less than 10 percent.



8. Three kinds of scales are frequently used on survey meters:
- a. Meters on which the user selects a linear scale must be calibrated at no less than two points on each scale. The points should be at approximately  $1/3$  and  $2/3$  of full scale.
  - b. Meters that have a multidecade logarithmic scale must be calibrated at no less than one point on each decade and no less than two points on one of the decades. Those points should be at approximately  $1/3$  and  $2/3$  of the decade.
  - c. Meters that have an automatically ranging digital display device for indicating rates must be calibrated at no less than one point on each decade and at no less than two points on one of the decades. Those points should be at approximately  $1/3$  and  $2/3$  of the decade.
9. Readings above 1,000 mR/hr need not be calibrated. However, such scales should be checked for operation and approximately correct response.
10. At the time of calibration, the apparent exposure rate from a built-in or owner-supplied check source must be determined and recorded.
11. The report of a survey meter calibration should indicate the procedure used and the data obtained. The description of the calibration will include:
- a. The owner or user of the instrument;
  - b. A description of the instrument that includes manufacturer, model number, serial number, and type of detector;
  - c. A description of the calibration source, including exposure rate at a specified distance on a specified date, and the calibration procedure;
  - d. For each calibration point, the calculated exposure rate, the indicated exposure rate, the deduced correction factor (the calculated exposure rate divided by the indicated exposure rate), and the scale selected on the instrument;
  - e. The reading indicated with the instrument in the "battery check" mode (if available on the instrument);
  - f. The angle between the radiation flux field and the detector (for external cylindrical GM or ionization-type detectors, this will usually be "parallel" or "perpendicular" indicating photons traveling either parallel with or perpendicular to the central axis of the detector; for instruments with internal detectors, this should be the angle between the flux field and a specified surface of the instrument);
  - g. For detectors with removable shielding, an indication of whether the shielding was in place or removed during the calibration procedure;

- h. The apparent exposure rate from the check source; and
  - i. The name of the person who performed the calibration and the date on which the calibration was performed.
12. The following information will be attached to the instrument as a calibration sticker or tag:
- a. The source that was used to calibrate the instrument;
  - b. The proper deflection in the battery check mode (unless this is clearly indicated on the instrument);
  - c. For each scale or decade, one of the following as appropriate:
    - (1) The average correction factor,
    - (2) A graph or graphs from which the correction factor for each scale or decade may be deduced, or
    - (3) An indication that the scale was checked for function but not calibrated or an indication that the scale was inoperative;
  - d. The angle between the radiation flux and the detector during the calibration; and
  - e. The apparent exposure rate from the check source.

Note: One-word reminders or symbols that are explained on the Survey Meter Calibration Report may be used on the calibration sticker.

See Exhibit 7 for a form you may want to use.

## APPENDIX C

### Model Procedure for Calibrating Dose Calibrator (See § 35.50.)

You or your contractor may use the following model procedure for checking and testing the dose calibrator. If you, or the contractor, follow the model procedure, you may say on your application, "We will establish and implement the model procedure for calibrating our dose calibrator that was published in Appendix C to Regulatory Guide 10.8, Revision 2."

If you develop your own dose calibrator calibration procedure for review, you should carefully review § 35.50 and all the features in the model procedure. Say on your application, "We have developed a dose calibrator calibration procedure for your review that is appended as ATT 9.3," and append your dose calibrator calibration procedure.

#### MODEL PROCEDURE

1. Test for the following at the indicated frequency. Consider repair, replacement, or arithmetic correction if the dose calibrator falls outside the suggested tolerances. (These recommended tolerances are more restrictive than those in the regulations to ensure that corrective action will be taken before the dose calibrator is outside permissible tolerances.)
  - a. Constancy at least once each day prior to assay of patient dosages ( $\pm 5$  percent).
  - b. Linearity at installation and at least quarterly thereafter ( $\pm 5$  percent).
  - c. Geometry dependence at installation ( $\pm 5$  percent).
  - d. Accuracy at installation and at least annually thereafter ( $\pm 5$  percent).
2. After repair, adjustment, or relocation of the dose calibrator, repeat the above tests as appropriate.
3. Constancy means reproducibility in measuring a constant source over a long period of time. Assay at least one relatively long-lived source such as Cs-137, Co-60, Co-57,\* or Ra-226\* using a reproducible geometry each day before using the calibrator. Consider the use of two or more sources with different photon energies and activities. Use the following procedure:
  - a. Assay each reference source using the appropriate dose calibrator setting (i.e., use the Cs-137 setting to assay Cs-137).
  - b. Measure background at the same setting, and subtract or confirm the proper operation of the automatic background subtract circuit if it is used.

\*Co-57 and Ra-226 are not subject to NRC licensing; the appropriate State agency should be consulted to determine its requirements for possessing this material.



- c. For each source used, either plot on graph paper or log in a book the background level for each setting checked and the net activity of each constancy source.
  - d. Using one of the sources, repeat the above procedure for all commonly used radioisotope settings. Plot or log the results.
  - e. Establish an action level or tolerance for each recorded measurement at which the individual performing the test will automatically notify the chief technician or authorized user of suspected malfunction of the calibrator. These action levels should be written in the log book or posted on the calibrator. The regulation requires repair or replacement if the error exceeds 10 percent.
4. Inspect the instrument on a quarterly basis to ascertain that the measurement chamber liner is in place and that the instrument is zeroed according to the manufacturer's instructions.
  5. Linearity means that the calibrator is able to indicate the correct activity over the range of use of that calibrator. This test is done using a vial or syringe of Tc-99m whose activity is at least as large as the maximum activity normally assayed in a prepared radiopharmaceutical kit, in a unit dosage syringe, or in a radiopharmaceutical therapy, whichever is largest.

#### Decay Method

- a. Assay the Tc-99m syringe or vial in the dose calibrator, and subtract background to obtain the net activity in millicuries. Record the date, time to the nearest minute, and net activity on the Dose Calibrator Linearity Test Form (see Exhibit 8). This first assay should be done in the morning at a regular time, for example, 8 a.m.
- b. Repeat the assay at about noon, and again at about 4 p.m. Continue on subsequent days until the assayed activity is less than 10 microcuries. For dose calibrators on which you select a range with a switch, select the range you would normally use for the measurement.
- c. Convert the time and date information you recorded to hours elapsed since the first assay.
- d. On a sheet of semilog graph paper or on a copy of the sample form in Exhibit 8, label the logarithmic vertical axis in millicuries and label the linear horizontal axis in hours elapsed. At the top of the graph, note the date and the manufacturer, model number, and serial number of the dose calibrator. Then plot the data.
- e. Draw a "best fit" straight line through the data points. For the point farthest from the line, calculate its deviation from the value on the line.  $(A\text{-observed} - A\text{-line}) / (A\text{-line}) = \text{deviation}$ .
- f. If the worst deviation is more than  $\pm 0.05$ , the dose calibrator should be repaired or adjusted. If this cannot be done, it will be necessary

to make a correction table or graph that will allow you to convert from activity indicated by the dose calibrator to "true activity."

- g. Put a sticker on the dose calibrator that says when the next linearity test is due.

#### Shield Method

If you decide to use a set of "sleeves" of various thicknesses to test for linearity, it will first be necessary to calibrate them.

- a. Begin the linearity test as described in the decay method described above. After making the first assay, the sleeves can be calibrated as follows. Steps b through d below must be completed within 6 minutes.
- b. Put the base and sleeve 1 in the dose calibrator with the vial. Record the sleeve number and indicated activity.
- c. Remove sleeve 1 and put in sleeve 2. Record the sleeve number and indicated activity.
- d. Continue for all sleeves.
- e. Complete the decay method linearity test steps b through g above.
- f. From the graph made in step d of the decay method, find the decay time associated with the activity indicated with sleeve 1 in place. This is the "equivalent decay time" for sleeve 1. Record that time with the data recorded in step b.
- g. Find the decay time associated with the activity indicated with sleeve 2 in place. This is the "equivalent decay time" for sleeve 2. Record that time with the data recorded in step c.
- h. Continue for all sleeves.
- i. The table of sleeve numbers and equivalent decay times constitutes the calibration of the sleeve set.

The sleeve set may now be used to test dose calibrators for linearity.

- a. Assay the Tc-99m syringe or vial in the dose calibrator, and subtract background to obtain the net activity in millicuries. Record the net activity.
- b. Steps c through e below must be completed within 6 minutes.
- c. Put the base and sleeve 1 in the dose calibrator with the vial. Record the sleeve number and indicated activity.
- d. Remove sleeve 1 and put in sleeve 2. Record the sleeve number and indicated activity.

- e. Continue for all sleeves.
  - f. On a sheet of semilog graph paper or on a copy of the sample form in Exhibit 8, label the logarithmic vertical axis in millicuries; and label the linear horizontal axis in hours elapsed. At the top of the graph, note the date and the model number and serial number of the dose calibrator.
  - g. Plot the data using the equivalent decay time associated with each sleeve.
  - h. Draw a "best fit" straight line through the data points. For the point farthest from the line, calculate its deviation from the value on the line.  $(A\text{-observed} - A\text{-line})/A\text{-line} = \text{deviation}$ .
  - i. If the worst deviation is more than +0.05, the dose calibrator should be repaired or adjusted. If this cannot be done, it will be necessary to make a correction table or graph that will allow you to convert from activity indicated by the dose calibrator to "true activity."
  - j. Put a sticker on the dose calibrator that says when the next linearity test is due.
6. Geometry independence means that the indicated activity does not change with volume or configuration. This test should be done using a syringe that is normally used for injections. Licensees who use generators and radiopharmaceutical kits should also do the test using a vial similar in size, shape, and construction to the radiopharmaceutical kit vials normally used. The following test assumes injections are done with 3-cc plastic syringes and that radiopharmaceutical kits are made in 30-cc glass vials. If you do not use these, change the procedure so that your syringes and vials are tested throughout the range of volumes commonly used.
- a. In a small beaker or vial, mix 2 cc of a solution of Tc-99m with an activity concentration between 1 and 10 mCi/ml. Set out a second small beaker or vial with nonradioactive saline. You may also use tap water.
  - b. Draw 0.5 cc of the Tc-99m solution into the syringe and assay it. Record the volume and millicuries indicated on the Dose Calibrator Geometry and Accuracy Form (see Exhibit 9).
  - c. Remove the syringe from the calibrator, draw an additional 0.5 cc of nonradioactive saline or tap water, and assay again. Record the volume and millicuries indicated.
  - d. Repeat the process until you have assayed a 2.0-cc volume.
  - e. Select as a standard the volume closest to that normally used for injections. For all the other volumes, divide the standard millicuries by the millicuries indicated for each volume. The quotient is a volume correction factor. Alternatively, you may graph the



data and draw horizontal 5 percent error lines above and below the chosen "standard volume."

- f. If any correction factors are greater than 1.05 or less than 0.95, or if any data points lie outside the 5 percent error lines, it will be necessary to make a correction table or graph that will allow you to convert from "indicated activity" to "true activity." If this is necessary, be sure to label the table or graph "syringe geometry dependence," and note the date of the test and the model number and serial number of the calibrator.
- g. To test the geometry dependence for a 30-cc glass vial, draw 1.0 cc of the Tc-99m solution into a syringe and then inject it into the vial. Assay the vial. Record the volume and millicuries indicated.
- h. Remove the vial from the calibrator and, using a clean syringe, inject 2.0 cc of nonradioactive saline or tap water, and assay again. Record the volume and millicuries indicated.
- i. Repeat the process until you have assayed a 19.0-cc volume. The entire process must be completed within 10 minutes.
- j. Select as a standard the volume closest to that normally used for mixing radiopharmaceutical kits. For all the other volumes, divide the standard millicuries by the millicuries indicated for each volume. The quotient is a volume correction factor. Alternatively, you may graph the data and draw horizontal 5 percent error lines above and below the chosen "standard volume."
- k. If any correction factors are greater than 1.05 or less than 0.95 or if any data points lie outside the 5 percent error lines, it will be necessary to make a correction table or graph that will allow you to convert from "indicated activity" to "true activity." If this is necessary, be sure to label the table or graph "vial geometry dependence," and note the date of the test and the model number and serial number of the calibrator.

7. Accuracy means that, for a given calibrated reference source, the indicated millicurie value is equal to the millicurie value determined by the National Bureau of Standards (NBS) or by the supplier who has compared that source to a source that was calibrated by the NBS. Certified sources are available from the NBS and from many radioisotope suppliers. At least two sources with different principal photon energies (such as Co-57, Co-60, or Cs-137) should be used. The regulations require that one must have a principal photon energy between 100 keV and 500 keV. The regulations also require that, if a Ra-226 source is used, it must be at least 10 microcuries; other sources must be at least 50 microcuries. Consider using at least one reference source whose activity is within the range of activities normally assayed.

- a. Assay a calibrated reference source at the appropriate setting (i.e., use the Co-57 setting to assay Co-57), and then remove the source and measure background. Subtract background from the indicated activity to obtain the net activity. Record this measurement on the

Dose Calibrator Geometry and Accuracy Form (see Exhibit 9). Repeat for a total of three determinations.

- b. Average the three determinations. The average value should be within 5 percent of the certified activity of the reference source, mathematically corrected for decay.
  - c. Repeat the procedure for other calibrated reference sources.
  - d. If the average value does not agree, within 5 percent, with the certified value of the reference source, the dose calibrator may need to be repaired or adjusted. The regulation requires repair or replacement if the error exceeds 10 percent.
  - e. At the same time the accuracy test is done, assay the source that will be used for the daily constancy test (it need not be a certified reference source) on all commonly used radioisotope settings. Record the settings and indicated millicurie values with the accuracy data.
  - f. Put a sticker on the dose calibrator that says when the next accuracy test is due.
8. The RSO will review and sign the records of all geometry, linearity, and accuracy tests.

See Exhibits 8 and 9 for some forms you may want to use.

## APPENDIX D

### Model Personnel External Exposure Monitoring Program (See § 20.101.)

You may use the following model program to monitor personnel external exposure. If you follow the guidance in the program, you may say on your application, "We will establish and implement the model personnel external exposure monitoring program published in Appendix D to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own program for review. If you do, you should consider for inclusion all the features in the model program and carefully review the requirements of § 20.101. Say on your application, "We have developed an external exposure monitoring program for your review that is appended as ATT 9.4," and append your monitoring program.

#### MODEL PROGRAM

1. The RSO will promptly review all exposure reports to look for workers or groups of workers whose exposure is unexpectedly high or low. This procedure does not apply to backup monitor records, for example, pocket ionization chambers, when the monitor of record is a film or thermoluminescence dosimeter (TLD).
2. All individuals who are occupationally exposed to ionizing photon radiation on a regular basis will be issued a film or TLD whole body monitor that will be processed by a contract service on a monthly basis.
3. All individuals who, on a regular basis, handle radioactive material that emits ionizing photons will be issued a film or TLD finger monitor that will be processed by a contract service on a monthly basis.
4. All individuals who are occupationally exposed to radiation on an occasional basis, such as nurses caring for radiopharmaceutical therapy or implant patients, will be issued a whole body monitor when caring for such patients.
5. Other individuals who are exposed to radiation on an occasional basis such as security personnel who deliver packages, secretarial personnel who work in the nuclear medicine clinic but do not work with patients, and nurses who occasionally care for patients who have received diagnostic dosages will not normally be issued exposure monitors.



## APPENDIX E

### Model Procedure for Checking Equipment Used in Mobile Nuclear Medicine Service (See §§ 35.29 and 35.80.)

The NRC normally limits its review of equipment quality assurance programs to those programs developed for radiation safety equipment. However, when delicate imaging equipment is transported from one location of use to another, e.g., by a mobile nuclear medicine service, it is reasonable to assume that it may suffer damage in transit. Therefore, the NRC requires that mobile nuclear medicine services have an imaging equipment quality assurance program to ensure that the use of byproduct material will not be inimical to the public health and safety. Mobile nuclear medicine services should also check ventilation equipment if gases or aerosols will be used.

You may use the following procedure to ensure the proper operation of imaging equipment that has been transported. If you follow the procedure, you may say on your application, "We will establish and implement the model procedure for ensuring equipment performance that was published in Appendix E to Regulatory Guide 10.8, Revision 2."

If you want to develop your own procedure for review, you should consider for inclusion all the features in the model procedure and the procedure recommended by the manufacturer and carefully review the requirements of §§ 35.29 and 35.80. Say on your application, "We have developed a procedure for ensuring equipment performance for your review that is appended as ATT. 9.5," and append your imaging equipment quality assurance procedure.

#### MODEL PROCEDURE

##### Survey Meter

Check the survey meter with the dedicated check source at each location of use. Material may not be used if the survey meter is not working. There is no need to keep a record of these checks.

##### Camera

1. Perform the following checks daily at each location of use before administering byproduct material:
  - a. Peak each camera according to the manufacturer's instructions.
  - b. Using either Tc-99m or Co-57, perform an extrinsic flood field with a frequently used collimator in place, or perform an intrinsic flood field test. Accumulate at least 1,000,000 counts for small-field-of-view cameras and 3,000,000 counts for large-field-of-view cameras. Process the image as if it were an image of a patient.
  - c. Do not administer material until an authorized user or a designated technologist approves the camera for use.

- d. You do not have to make a permanent record of these daily checks.
2. Perform the following checks weekly:
    - a. With the same frequently used collimator in place, image a flood source and either a parallel-line-equal-space (PLES), bar, orthogonal-hole (OH) or resolution-quadrant phantom with the flood field as a source.
    - b. If a PLES or bar phantom is used, rotate it 90° so that the camera is tested for both vertical and horizontal geometric linearity.
    - c. If a resolution-quadrant phantom is used, rotate it so that each quadrant is imaged in each quadrant of the crystal. Then turn it over and again image it four more times. This procedure will check both resolution and horizontal and vertical geometric linearity in each quadrant of the crystal.
    - d. Process the images as if they were images of a patient. Mark them clearly to indicate image orientation, source activity, and date.
    - e. Retain the images for 2 years.
  3. Perform the following safety checks after repairs and quarterly:
    - a. Check the motion interlocks by activating the emergency-off switches on the camera. With the camera in motion, activation of the emergency-off switch should stop the motion. If this might jeopardize imaging components in the system, perform only the checks described in paragraph 3.b.
    - b. Check the motion switches. Put the camera in motion and first release just the direction switch to stop the motion. Then put the camera back in motion and release just the dead-man switch. Test all motion switches and all directions in this manner. Release of either the motion switch or the dead-man switch alone should disable the camera motion. If this is not the case, repair the camera before clinical use.
  4. Set the equipment in the same manner each time checks are run. Make a record of all these checks. Keep a separate file or ring binder for each camera. Retain the record for 2 years.

#### Ventilation

If gases or aerosols will be used, check the ventilation supply, exhaust vents, and collection devices for operation with tissue paper or a velometer. There is no need to keep a record of these checks.



## APPENDIX F

### Model Radiation Safety Committee Charter and Radiation Safety Officer Delegation of Authority (See §§ 35.21, 35.22, and 35.23.)

You may use the following text as it appears here, saying on your application, "We will issue the model Radiation Safety Committee Charter and Radiation Safety Officer Delegation of Authority that was published in Appendix F to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own statement of authority, duties, administrative procedures, and delegation of authority. If you do so, you should consider for inclusion all the features in the model text and carefully review the requirements of §§ 35.22. Say on your application, "We will issue the Radiation Safety Committee Charter and Radiation Safety Officer Delegation of Authority that are appended as ATT 10.1," and append your charter and delegation.

#### MODEL CHARTER

Charge. The Committee shall:

1. Ensure that licensed material will be used safely. This includes review as necessary of training programs, equipment, facility, supplies, and procedures;
2. Ensure that licensed material is used in compliance with NRC regulations and the institutional license;
3. Ensure that the use of licensed material is consistent with the ALARA philosophy and program;
4. Establish a table of investigational levels for individual occupational radiation exposures; and
5. Identify program problems and solutions.

Responsibilities. The Committee shall:

1. Be familiar with all pertinent NRC regulations, the license application, the license, and amendments;
2. Review the training and experience of the proposed authorized users, the Radiation Safety Officer (RSO), and the teletherapy physicist to determine that their qualifications are sufficient to enable the individuals to perform their duties safely and are in accordance with the regulations and the license;
3. Review on the basis of safety and approve or deny, consistent with the limitations of the regulations, the license, and the ALARA philosophy, all requests for authorization to use radioactive material within the institution;

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4. Prescribe special conditions that will be required during a proposed method of use of radioactive material such as requirements for bioassays, physical examinations of users, and special monitoring procedures;
5. Review quarterly the RSO's summary report of the occupational radiation exposure records of all personnel, giving attention to individuals or groups of workers whose occupational exposure appears excessive;
6. Establish a program to ensure that all persons whose duties may require them to work in or frequent areas where radioactive materials are used (e.g., nursing, security, housekeeping, physical plant) are appropriately instructed as required in § 19.12 of 10 CFR Part 19;
7. Review at least annually the RSO's summary report of the entire radiation safety program to determine that all activities are being conducted safely, in accordance with NRC regulations and the conditions of the license, and consistent with the ALARA program and philosophy. The review must include an examination of records, reports from the RSO, results of NRC inspections, written safety procedures, and the adequacy of the management control system;
8. Recommend remedial action to correct any deficiencies identified in the radiation safety program;
9. Maintain written minutes of all Committee meetings, including members in attendance and members absent, discussions, actions, recommendations, decisions, and numerical results of all votes taken; and
10. Ensure that the byproduct material license is amended if required prior to any changes in facilities, equipment, policies, procedures, and personnel.

#### Administrative Information

1. The Committee shall meet as often as necessary to conduct its business but not less than once in each calendar quarter.
2. Membership must include one authorized user for each type of use authorized by the license, the RSO, a representative of the nursing service, and a representative of management who is neither an authorized user nor an RSO. Management may appoint alternate members to participate in meetings in the case of absence of principal members and should consider appointing as adjunct members representatives from security, physical plant, housekeeping, and other departments. (Adjunct members should abstain from balloting on radiation safety technical questions such as Items 2 through 5 in the "Responsibilities" section above.)
3. To establish a quorum, one-half of the Committee's membership, including the RSO and the management representative, must be present.
4. To the extent that they do not interfere with the mission of the Committee, management may assign other responsibilities such as x-ray radiation safety, quality assurance oversight, and research project review and approval.



APPENDIX G

Model Program for Maintaining Occupational Radiation Exposure  
at Medical Institutions ALARA  
(See § 35.20.)

You may use the text as it appears here, saying on your application, "We will establish and implement the model ALARA program that was published in Appendix G to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own ALARA program for NRC review. If you do so, you should consider for inclusion all the features in the model and carefully review the requirements of § 35.20. Say on your application, "We have developed an ALARA program for your review that is appended as ATT 10.2," and append your program.

ALARA PROGRAM

\_\_\_\_\_  
Sioux Valley Hospital  
(Licensee's Name)

\_\_\_\_\_  
December 1988  
(Date)

1. Management Commitment

- a. We, the management of this (medical facility, hospital, etc.), are committed to the program described herein for keeping individual and collective doses as low as is reasonably achievable (ALARA). In accord with this commitment, we hereby describe an administrative organization for radiation safety and will develop the necessary written policy, procedures, and instructions to foster the ALARA concept within our institution. The organization will include a Radiation Safety Committee (RSC) and a Radiation Safety Officer (RSO).
- b. We will perform a formal annual review of the radiation safety program, including ALARA considerations. This will include reviews of operating procedures and past dose records, inspections, etc., and consultations with the radiation safety staff or outside consultants.
- c. Modifications to operating and maintenance procedures and to equipment and facilities will be made if they will reduce exposures unless the cost, in our judgment, is considered to be unjustified. We will be able to demonstrate, if necessary, that improvements have been sought, that modifications have been considered, and that they have been implemented when reasonable. If modifications have been recommended but not implemented, we will be prepared to describe the reasons for not implementing them.
- d. In addition to maintaining doses to individuals as far below the limits as is reasonably achievable, the sum of the doses received by all exposed individuals will also be maintained at the lowest practicable



level. It would not be desirable, for example, to hold the highest doses to individuals to some fraction of the applicable limit if this involved exposing additional people and significantly increasing the sum of radiation doses received by all involved individuals.

## 2. Radiation Safety Committee

### a. Review of Proposed Users and Uses

- (1) The RSC will thoroughly review the qualifications of each applicant with respect to the types and quantities of materials and methods of use for which application has been made to ensure that the applicant will be able to take appropriate measures to maintain exposure ALARA.
- (2) When considering a new use of byproduct material, the RSC will review the efforts of the applicant to maintain exposure ALARA.
- (3) The RSC will ensure that the users justify their procedures and that individual and collective doses will be ALARA.

### b. Delegation of Authority

(The judicious delegation of RSC authority is essential to the enforcement of an ALARA program.)

- (1) The RSC will delegate authority to the RSO for enforcement of the ALARA concept.
- (2) The RSC will support the RSO when it is necessary for the RSO to assert authority. If the RSC has overruled the RSO, it will record the basis for its action in the minutes of the quarterly meeting.

### c. Review of ALARA Program

- (1) The RSC will encourage all users to review current procedures and develop new procedures as appropriate to implement the ALARA concept.
- (2) The RSC will perform a quarterly review of occupational radiation exposure with particular attention to instances in which the investigational levels in Table 1 are exceeded. The principal purpose of this review is to assess trends in occupational exposure as an index of the ALARA program quality and to decide if action is warranted when investigational levels are exceeded (see Section 6 below for a discussion of investigational levels).\*

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\*The NRC has emphasized that the investigational levels in this program are not new dose limits but, as noted in ICRP Report 26, "Recommendations of the International Commission on Radiological Protection," serve as check points above which the results are considered sufficiently important to justify investigations.

Table 1  
Investigational Levels

	Investigational Levels (mrems per calendar quarter)	
	Level I	Level II
1. Whole body; head and trunk; active blood-forming organs; lens of eyes; or gonads	125	375
2. Hands and forearms; feet and ankles	1875	5625
3. Skin of whole body*	750	2250

\*Not normally applicable to medical use operations except those using significant quantities of beta-emitting isotopes.

(3) The RSC will evaluate our institution's overall efforts for maintaining doses ALARA on an annual basis. This review will include the efforts of the RSO, authorized users, and workers as well as those of management.

3. Radiation Safety Officer

a. Annual and Quarterly Review

- (1) Annual review of the radiation safety program. The RSO will perform an annual review of the radiation safety program for adherence to ALARA concepts. Reviews of specific methods of use may be conducted on a more frequent basis.
- (2) Quarterly review of occupational exposures. The RSO will review at least quarterly the external radiation doses of authorized users and workers to determine that their doses are ALARA in accordance with the provisions of Section 6 of this program and will prepare a summary report for the RSC.
- (3) Quarterly review of records of radiation surveys. The RSO will review radiation surveys in unrestricted and restricted areas to determine that dose rates and amounts of contamination were at ALARA levels during the previous quarter and will prepare a summary report for the RSC.

b. Education Responsibilities for ALARA Program

- (1) The RSO will schedule briefings and educational sessions to inform workers of ALARA program efforts.



(2) The RSO will ensure that authorized users, workers, and ancillary personnel who may be exposed to radiation will be instructed in the ALARA philosophy and informed that management, the RSC, and the RSO are committed to implementing the ALARA concept.

c. Cooperative Efforts for Development of ALARA Procedures

Radiation workers will be given opportunities to participate in formulating the procedures that they will be required to follow.

- (1) The RSO will be in close contact with all users and workers in order to develop ALARA procedures for working with radioactive materials.
- (2) The RSO will establish procedures for receiving and evaluating the suggestions of individual workers for improving health physics practices and will encourage the use of those procedures.

d. Reviewing Instances of Deviation from Good ALARA Practices

The RSO will investigate all known instances of deviation from good ALARA practices and, if possible, will determine the causes. When the cause is known, the RSO will implement changes in the program to maintain doses ALARA.

4. Authorized Users

a. New Methods of Use Involving Potential Radiation Doses

- (1) The authorized user will consult with the RSO and/or RSC during the planning stage before using radioactive materials for new uses.
- (2) The authorized user will review each planned use of radioactive materials to ensure that doses will be kept ALARA. Trial runs may be helpful.

b. Authorized User's Responsibility to Supervised Individuals

- (1) The authorized user will explain the ALARA concept and the need to maintain exposures ALARA to all supervised individuals.
- (2) The authorized user will ensure that supervised individuals who are subject to occupational radiation exposure are trained and educated in good health physics practices and in maintaining exposures ALARA.

5. Individuals Who Receive Occupational Radiation Doses

- a. Workers will be instructed in the ALARA concept and its relationship to work procedures and work conditions.
- b. Workers will be instructed in recourses available if they feel that ALARA is not being promoted on the job.



6. Establishment of Investigational Levels in Order to Monitor Individual Occupational External Radiation Doses

This institution hereby establishes investigational levels for occupational external radiation doses which, when exceeded, will initiate review or investigation by the RSC and/or the RSO. The investigational levels that we have adopted are listed in Table 1. These levels apply to the exposure of individual workers.

The RSO will review and record on Form NRC-5, "Current Occupational External Radiation Exposures," or an equivalent form (e.g., dosimeter processor's report) results of personnel monitoring not less than once in any calendar quarter as required by § 20.401 of 10 CFR Part 20. The following actions will be taken at the investigational levels as stated in Table 1:

a. Personnel dose less than Investigational Level I.

Except when deemed appropriate by the RSO, no further action will be taken in those cases where an individual's dose is less than Table 1 values for the Investigational Level I.

b. Personnel dose equal to or greater than Investigational Level I but less than Investigational Level II.

The RSO will review the dose of each individual whose quarterly dose equals or exceeds Investigational Level I and will report the results of the reviews at the first RSC meeting following the quarter when the dose was recorded. If the dose does not equal or exceed Investigational Level II, no action related specifically to the exposure is required unless deemed appropriate by the Committee. The Committee will, however, review each such dose in comparison with those of others performing similar tasks as an index of ALARA program quality and will record the review in the Committee minutes.

c. Personnel dose equal to or greater than Investigational Level II.

The RSO will investigate in a timely manner the causes of all personnel doses equaling or exceeding Investigational Level II and, if warranted, will take action. A report of the investigation, any actions taken, and a copy of the individual's Form NRC-5 or its equivalent will be presented to the RSC at its first meeting following completion of the investigation. The details of these reports will be included in the RSC minutes.

d. Reestablishment of investigational levels to levels above those listed in Table 1.

In cases where a worker's or a group of workers' doses need to exceed an investigational level, a new, higher investigational level may be established for that individual or group on the basis that it is consistent with good ALARA practices. Justification for new investigational levels will be documented.

The RSC will review the justification for and must approve or disapprove all revisions of investigational levels.

7. Signature of Certifying Official\*

I hereby certify that this institution has implemented the ALARA Program set forth above.

Dianne Eibner  
Signature

Dianne Eibner  
Name (print or type)

Director of Patient Care  
Title

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\* The person who is authorized to make commitments for the administration of the institution (e.g., hospital administrator).



## APPENDIX H

### Model Procedure for Leak-Testing Sealed Sources (See § 35.59.)

You or your contractor may use the following model procedure to leak-test sealed sources. If you, or the contractor, follow the model procedure you may say on your application, "We will establish and implement the model procedure for leak-testing sealed sources that was published in Appendix H to Regulatory Guide 10.8, Revision 2."

You may develop your own procedure for review. If you do so, you should consider for inclusion all the features in the model and carefully review the requirements of § 35.59. Say on your application, "We have developed a leak-test procedure for your review that is appended as ATT 10.3," and append your leak-test procedure.

#### MODEL PROCEDURE

1. Make a list of all sources to be tested. This should include at least the isotope, the activity on a specified date, and the physical form.
2. If you will be testing sources stronger than a few millicuries, set out a survey meter, preferably with a speaker, so you can monitor your exposure rate.
3. Prepare a separate wipe sample for each source. A cotton swab, injection prep pad, filter paper, or tissue paper is suitable. Number each wipe so you will know for which source it is to be used. Samples should be taken as follows:
  - a. For small sealed sources, it may be easier to wipe the entire accessible surface area. Pay particular attention to seams and joints. However, do not wipe the port of beta applicators.
  - b. For larger sealed sources and devices (survey meter calibrator, bone mineral analyzer source), take the wipe near the radiation port and on the activating mechanism.
  - c. For teletherapy machines, take the wipe with the source in the off position. Wipe the area near the shutter mechanism, taking care to touch neither field light and mirror nor crosshairs. Also wipe the primary and secondary collimators and trimmers.
  - d. If you are testing radium sources at the same time you are testing NRC-licensed sources, they should also be checked for radon leakage. This can be done by submerging the source in a vial of fine-grained charcoal or cotton for a day. Then remove the source and analyze the adsorbent sample as described below. A survey should be done to be sure the sources are adequately shielded during the leak-test period.



4. The samples will be analyzed as follows:

- a. Select an instrument that is sufficiently sensitive to detect 0.005 microcurie. For beta sources, a proportional flow counter, liquid scintillation counter, or thin-end-window GM survey meter may be appropriate. For gamma sources, a crystal with a ratemeter or scaler or a GM survey meter may be appropriate. Dose calibrators used in nuclear medicine are not sufficiently sensitive.
- b. To estimate the detection efficiency of the analyzer used to assay the wipe samples, assay a check source that has the same isotope as the sealed source and whose activity is certified by the supplier. If one is not available, it will be necessary to use a certified check source with a different isotope that has a similar spectrum. If calculations demonstrate that the instrument is not sufficiently sensitive to detect 0.005 microcurie, a different instrument must be used.
- c. Assay the wipe sample. It must be in the same geometry relative to the detector as was the certified check source.
- d. Record the wipe sample counts per minute. Then calculate and record the estimated activity in microcuries on the wipe sample.
- e. Continue the same analysis procedure for all wipe samples.
- f. If the wipe sample activity is 0.005 microcurie or greater, notify the RSO. The source must be withdrawn from use to be repaired or discarded. If it is a source distributed under an NRC or Agreement State license, the NRC must be notified. (See paragraph 21.21(b) of 10 CFR Part 21 and paragraph 35.59(e)(2) of 10 CFR Part 35.)
- g. Sign and date the list of sources, data, and calculations.

## APPENDIX I

### Model Rules for Safe Use of Radiopharmaceuticals (See § 35.21.)

You may use the following model rules as they appear here, saying on your application, "We will establish and implement the model safety rules published in Appendix I to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own rules for safe use of radiopharmaceuticals for review. If you do so, you should consider for inclusion all the items in the model rules and carefully review the requirements of Part 35. Say on your application, "We have developed rules for the safe use of radiopharmaceuticals for your review that are appended as ATT 10.4," and append your model rules for the safe use of radiopharmaceuticals.

#### MODEL RULES

1. Wear laboratory coats or other protective clothing at all times in areas where radioactive materials are used.
2. Wear disposable gloves at all times while handling radioactive materials.
3. Either after each procedure or before leaving the area, monitor your hands for contamination in a low-background area with a crystal probe or camera.
4. Use syringe shields for routine preparation of multi-dose vials and administration of radiopharmaceuticals to patients, except in those circumstances in which their use is contraindicated (e.g., recessed veins, infants). In these exceptional cases, consider the use of other protective methods such as remote delivery of the dose (e.g., through use of a butterfly valve).
5. Do not eat, drink, smoke, or apply cosmetics in any area where radioactive material is stored or used.
6. Do not store food, drink, or personal effects in areas where radioactive material is stored or used.
7. Wear personnel monitoring devices at all times while in areas where radioactive materials are used or stored. These devices should be worn as prescribed by the Radiation Safety Officer. When not being worn to monitor occupational exposures, personnel monitoring devices should be stored in the work place in a designated low-background area.
8. Wear a finger exposure monitor during the elution of generators; during the preparation, assay, and injection of radiopharmaceuticals; and when holding patients during procedures.
9. Dispose of radioactive waste only in designated, labeled, and properly shielded receptacles.
10. Never pipette by mouth.

11. Wipe-test byproduct material storage, preparation, and administration areas weekly for contamination. If necessary, decontaminate or secure the area for decay.
12. With a radiation detection survey meter, survey the generator storage, kit preparation, and injection areas daily for contamination. If necessary, decontaminate or secure the area for decay as appropriate.
13. Confine radioactive solutions in shielded containers that are clearly labeled. Radiopharmaceutical multidose diagnostic vials and therapy vials should be labeled with the isotope, the name of the compound, and the date and time of receipt or preparation. A log book should be used to record the preceding information and total prepared activity, specific activity as mCi/cc at a specified time, total volume prepared, total volume remaining, the measured activity of each patient dosage, and any other appropriate information. Syringes and unit dosages should be labeled with the radiopharmaceutical name or abbreviation, type of study, or the patient's name.
14. Assay each patient dosage in the dose calibrator before administering it. Do not use a dosage if it is more than 10 percent off from the prescribed dosage, except for prescribed dosages of less than 10 microcuries. When measuring the dosage, you need not consider the radioactivity that adheres to the syringe wall or remains in the needle. Check the patient's name and identification number and the prescribed radionuclide, chemical form, and dosage before administering.
15. Always keep flood sources, syringes, waste, and other radioactive material in shielded containers.
16. Because even sources with small amounts of radioactivity exhibit a high dose rate on contact, you should use a cart or wheelchair to move flood sources, waste, and other radioactive material.



## APPENDIX J

### Model Spill Procedures (See § 35.21.)

You may use the following model spill procedures as they appear here, saying on your application, "We will establish and implement the model spill procedures published in Appendix J to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own spill procedures for review. If you do so, you should consider for inclusion all the items in the model procedures. Say on your application, "We have developed spill procedures for your review that are appended as ATT 10.5," and append your spill procedures.

#### MODEL PROCEDURES

##### Minor Spills of Liquids and Solids

1. Notify persons in the area that a spill has occurred.
2. Prevent the spread of contamination by covering the spill with absorbent paper.
3. Clean up the spill using disposable gloves and absorbent paper. Carefully fold the absorbent paper with the clean side out and place in a plastic bag for transfer to a radioactive waste container. Also put contaminated gloves and any other contaminated disposable material in the bag.
4. Survey the area with a low-range radiation detector survey meter. Check the area around the spill. Also check your hands, clothing, and shoes for contamination.
5. Report the incident to the Radiation Safety Officer (RSO).
6. The RSO will follow up on the cleanup of the spill and will complete the Radioactive Spill Report (see Exhibit 10) and the Radioactive Spill Contamination Survey (see Exhibit 11).

##### Major Spills of Liquids and Solids

1. Clear the area. Notify all persons not involved in the spill to vacate the room.
2. Prevent the spread of contamination by covering the spill with absorbent paper, but do not attempt to clean it up. To prevent the spread of contamination, limit the movement of all personnel who may be contaminated.
3. Shield the source if possible. This should be done only if it can be done without further contamination or a significant increase in radiation exposure.
4. Close the room and lock or otherwise secure the area to prevent entry.
5. Notify the RSO immediately.

6. Decontaminate personnel by removing contaminated clothing and flushing contaminated skin with lukewarm water and then washing with mild soap. If contamination remains, induce perspiration by covering the area with plastic. Then wash the affected area again to remove any contamination that was released by the perspiration.
7. The RSO will supervise the cleanup of the spill and will complete the Radioactive Spill Report (see Exhibit 10) and the Radioactive Spill Contamination Survey (see Exhibit 11).

The following is not part of the model spill procedure:

#### Major Spills and Minor Spills

The decision to implement a major spill procedure instead of a minor spill procedure depends on many incident-specific variables such as the number of individuals affected, other hazards present, likelihood of spread of contamination, and types of surfaces contaminated as well as the radiotoxicity of the spilled material. For some spills of short-lived radionuclides the best spill procedure may be restricted access pending complete decay.

Table J-1, which may be used as general guidance to determine whether a major spill procedure or a minor spill procedure should be implemented, was developed based on a comparison of information from the following sources:

1. "Standards for Protection Against Radiation," Proposed Rule, Part 20, published January 9, 1986, Appendix B, Table 1, Column 3 (Derived Air Concentration Values), 51 FR 1092.
2. "Gamma Radiation Levels for One Curie of Some Radionuclides," Radio-logical Health Handbook, January 1970 edition, Department of Health, Education, and Welfare, Washington, DC, p. 131.
3. National Council on Radiation Protection and Measurements, "Safe Handling of Radioactive Materials," NCRP Report No. 30, paragraph 2.3 and Table 2, 1964.
4. "Upgraded Emergency Preparedness for Certain Fuel Cycle and Materials Licensees," Advance Notice of Proposed Rulemaking on Parts 30, 40, and 70, 46 FR 29712, Table 1, June 3, 1981.

Table J-1 may need to be modified before being used for guidance in a specific area of use.

TABLE J-1

Relative Hazards of Common Radionuclides

Estimate the amount of radioactivity spilled. Initiate a major or minor spill procedure based on the following dividing line. Spills above these millicurie amounts are considered major, below are considered minor.

Radionuclide	Millicuries	Radionuclide	Millicuries
P-32	10	Tc-99m	100
Cr-51	100	In-111	10
Co-57	100	I-123	10
Co-58	10	I-125	1
Fe-59	10	I-131	1
Co-60	1	Yb-169	10
Ga-67	100	Hg-197	100
Se-75	10	Au-198	10
Sr-85	10	Tl-201	100

Spill Kit

You may also want to consider assembling a spill kit that contains:

- 6 pairs disposable gloves, 1 pair housekeeping gloves
- 2 disposable lab coats
- 2 paper hats
- 2 pairs shoe covers
- 1 roll absorbent paper with plastic backing
- 6 plastic trash bags with twist ties
- "Radioactive Material" labeling tape
- 1 china pencil or marking pen
- 3 prestrung "Radioactive Material" labeling tags
- Supplies for 10 contamination wipe samples
- Instructions for "Emergency Procedures"
- Clipboard with one copy of Radioactive Spill Report Form
- Pencil

Forms

You may want to use Exhibit 10, Radioactive Spill Report, and Exhibit 11, Radioactive Spill Contamination Survey Forms.



## APPENDIX K

### Model Guidance for Ordering and Receiving Radioactive Material (See §§ 30.51 and 20.205.)

You may use the following guidance to control the ordering and receipt of radioactive material. If you follow all the guidance, you may say on your application, "We will establish and implement the model guidance for ordering and receiving radioactive material that was published in Appendix K to Regulatory Guide 10.8, Revision 2."

If your procedure does not follow all the guidance in the model, you may develop your own procedure for review. If you do so, you should consider for inclusion all the features in the model and carefully review the requirements of §§ 30.51 and 20.205. Say on your application, "We have developed a procedure for ordering and receiving radioactive material for your review that is appended as ATT 10.6," and append your procedure for ordering and receiving radioactive material.

#### MODEL GUIDANCE

1. The Radiation Safety Officer (RSO) or a designee must authorize each order for radioactive materials and ensure that the requested materials and quantities are authorized by the license for use by the requesting authorized user and that possession limits are not exceeded.
2. The RSO will establish and maintain a system for ordering and receiving radioactive material. The system must contain the following information:
  - a. For routinely used materials
    - (1) Written records that identify the authorized user or department, isotope, chemical form, activity, and supplier will be made.
    - (2) The above records will be checked to confirm that material received was ordered through proper channels.
  - b. For occasionally used materials (e.g., therapeutic dosages)
    - (1) The authorized user who will perform the procedure will make a written request that indicates the isotope, radiopharmaceutical, activity, and supplier.
    - (2) The person who receives the material will check the physician's written request to confirm that the material received is what was ordered.
3. For deliveries during normal working hours, the RSO will tell carriers to deliver radioactive packages directly to a specified area.
4. For deliveries during off-duty hours, the RSO will tell security personnel or other designated persons to accept delivery of radioactive packages in accordance with procedures outlined in the sample memorandum below.

Sample Memorandum

MEMO TO: Chief of Security  
FROM: Radiation Safety Officer  
SUBJECT: Receipt of Packages Containing Radioactive Material

The security guard on duty shall accept delivery of packages containing radioactive material that arrive during other than normal working hours. Packages should be placed on a cart or wheelchair and taken immediately to the Nuclear Medicine Department, Room \_\_\_\_\_. Unlock the door, place the package on top of the counter, and relock the door.

If the package appears to be damaged, immediately contact one of the individuals identified below. Ask the carrier to remain at the hospital until it can be determined that neither the driver nor the delivery vehicle is contaminated.

If you have any questions concerning this memorandum, please call our hospital Radiation Safety Officer, \_\_\_\_\_, at extension \_\_\_\_.

	Name	Home Telephone
Radiation Safety Officer:	_____	_____
Chief of Nuclear Medicine:	_____	_____
Chief Nuclear Medicine Technologist:	_____	_____
Nuclear Medicine Technologist on call		
(call page operator at extension ____)		
Nuclear Medicine Physician on call		
(call page operator at extension ____)		

## APPENDIX L

### Model Procedure for Safely Opening Packages Containing Radioactive Material (See §§ 35.23, 30.51, 20.203(f)(4), and 20.205.)

You may use the following model procedure for opening packages. If you follow the model procedure, you may say on your application, "We will establish and implement the model procedure for opening packages that was published in Appendix L to Regulatory Guide 10.8, Revision 2."

If you develop your own package opening procedure for review, you should consider for inclusion all the features in the model. Say on your application, "We have developed a package opening procedure for your review that is appended as ATT 10.7," and append your package opening procedure.

#### MODEL PROCEDURE

1. Special requirements must be followed for packages containing quantities of radioactive material in excess of the Type A quantity limits specified in paragraph 20.205(b) of 10 CFR Part 20 (e.g., more than 20 curies of Mo-99, Tc-99m, uncompressed Xe-133, or more than 3 curies of Xe-133, I-131, Cs-137, Ir-192, I-125, or more than 0.001 curie of Ra-226). Such packages must be monitored for external radiation levels and surface contamination within 3 hours after receipt if received during working hours or within 18 hours if received after working hours, in accordance with the requirements of paragraphs 20.205(a) through (c). The NRC Regional Office must be notified if removable contamination exceeds 0.01 microcurie (22,000 dpm)/100 cm<sup>2</sup>.
2. For packages received under the specific license, the following procedure for opening each package will be followed:
  - a. Put on gloves to prevent hand contamination.
  - b. Visually inspect the package for any sign of damage (e.g., wet or crushed). If damage is noted, stop the procedure and notify the Radiation Safety Officer (RSO).
  - c. Measure the exposure rate from the package at 1 meter and at the package surface. If it is higher than expected, stop and notify the RSO. (The "transport index" noted on packages with "Yellow II" or "Yellow III" labels is the approximate dose rate, in millirem per hour, at 1 meter from the package surface (see § 71.4 of 10 CFR Part 71); the surface dose rate for such packages should not exceed 200 millirem per hour. The dose rate from packages with "White I" labels should be less than 0.5 millirem per hour at the package surface. (See § 172.403 of 49 CFR Part 172.))
  - d. Open the package with the following precautionary steps:
    - (1) Remove the packing slip.



- (2) Open the outer package following the supplier's instructions, if provided.
  - (3) Open the inner package and verify that the contents agree with the packing slip.
  - (4) Check the integrity of the final source container. Look for broken seals or vials, loss of liquid, condensation, or discoloration of the packing material.
  - (5) If anything is other than expected, stop and notify the RSO.
- e. If there is any reason to suspect contamination, wipe the external surface of the final source container and remove the wipe sample to a low-background area. Assay the wipe sample to determine if there is any removable radioactivity. [The licensee should specify in the procedure manual which instrument, for example, a thin-end-window GM survey meter, a NaI(Tl) crystal and ratemeter, a liquid scintillation counter, or a proportional flow counter, should be used for these assays. The detection efficiency must be determined to convert wipe sample counts per minute to disintegrations per minute. Note that a dose calibrator is not sufficiently sensitive for this measurement.] Take precautions against the potential spread of contamination.
  - f. Check the user request to ensure that the material received is the material that was ordered.
  - g. Monitor the packing material and the empty packages for contamination with a radiation detection survey meter before discarding.
    - (1) If contaminated, treat this material as radioactive waste.
    - (2) If not contaminated, remove or obliterate the radiation labels before discarding in in-house trash.
  - h. Make a record of the receipt.
3. For packages received under the general license in § 31.11, the following procedure for opening each package will be followed:
    - a. Visually inspect the package for any sign of damage (e.g., wet or crushed). If damage is noted, stop the procedure and notify the RSO.
    - b. Check to ensure that the material received is the material that was ordered.

See Exhibit 12 for a sample record form you may want to use.

## APPENDIX M

### Records of Byproduct Material Use

#### General

Many suppliers include pressure-sensitive stickers or forms that have much of the information required by the regulations. You may use these in your records and need not duplicate the information on them. Be sure to write down whatever additional information is required but is not cued or printed on them. Information does not have to be recorded in the order given in these procedures. Also, you do not have to replicate entries. For example, if you prepare a multidose vial for use one day, you do not have to record the date each time you draw a dosage from it; if you take 30 Ir-192 seeds that are each 0.5 millicuries, you do not have to list each seed individually.

#### M.1 Records of Unit Dosage Use (§§ 30.51, 35.21, 35.53)

You may use the following model procedure to keep a record of unit dosage use. If you will follow the model procedure, you may say on your application, "We will establish and implement the model procedure for a unit dosage record system that was published in Appendix M.1 to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own unit dosage record system for review. If you do so, you should consider for inclusion all the features in the model procedure and carefully review the requirements of §§ 30.51, 35.21, and 35.53. Say on your application, "We have developed a procedure for a unit dosage record system for your review that is appended as ATT 10.8," and append your unit dosage record procedure.

#### MODEL PROCEDURE

For each unit dosage received from a supplier, make a record of the:

1. Radionuclide;
2. Generic name or its abbreviation or trade name;
3. Date of receipt;
4. Supplier;
5. Lot number or control number, if assigned;
6. Activity in millicuries or microcuries as recorded on the unit dosage or packing slip and its associated time;
7. Date of administration or disposal;
8. If administered,
  - a. Prescribed dosage (unless already recorded in clinical procedure manual),

- b. Measured activity in millicuries or microcuries and date and time of measurement,
  - c. Patient name and identification number if one has been assigned;
9. If discarded, the date and method of disposal; and
  10. Initials of the individual who made the record.

See Exhibit 13 for a Unit Dosage Receipt and Use Log Form you may want to use.

#### M.2 Records of Multidose Vial Use (§§ 30.51, 35.21, 35.53)

You may use the following model procedure to keep a record of multidose vial use. If you will follow the model procedure, you may say on your application, "We will establish and implement the model procedure for a multidose vial record system that was published in Appendix M.2 to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own multidose vial record system for review. If you do so, you should consider for inclusion all the features in the model system and carefully review the requirements of §§ 30.51, 35.21, and 35.53. Say on your application, "We have developed a procedure for a multidose vial record system for your review that is appended as ATT 10.9," and append your multidose vial record procedure.

#### MODEL PROCEDURE

For each multidose vial that you receive from a supplier or that you prepare, make a record of the:

1. Radionuclide;
2. Generic name or its abbreviation or trade name;
3. Date of receipt or preparation;
4. Date and time of initial assay and amount in both millicuries and cubic centimeters (cc) or milliliters (ml);
5. Supplier or kit manufacturer;
6. If administered,
  - a. Prescribed dosage (unless already recorded in clinical procedure manual),
  - b. Date and time dosage was drawn and measured,
  - c. Calculated volume that is needed for the prescribed dosage,
  - d. Measured activity in millicuries or microcuries,
  - e. Patient name and identification number if one has been assigned;
7. If discarded, the method of disposal and date; and
8. Initials of the individual who made the record.



See Exhibit 14 for a Multidose Vial Preparation and Use Log Form you may want to use.

### M.3 Measuring and Recording Molybdenum Concentration (§ 35.204)

The regulations require that each licensee who uses a technetium generator to prepare radiopharmaceuticals must test each elution or extraction for its molybdenum concentration. (This does not have to be done when using radiopharmaceuticals obtained from a distributor.) This measurement is usually made with a dose calibrator. Licensees may not administer radiopharmaceuticals that contain more than 0.15 microcurie of Mo-99 per millicurie of Tc-99m at the time of administration. If an elution or extraction has a higher concentration, there may be a manufacturing defect that should be reported under paragraph 21.21(b) of 10 CFR Part 21.

The model procedure for measuring molybdenum concentration is based on the use of a "molybdenum breakthrough pig." Your dose calibrator manufacturer will usually supply, as an option, a molybdenum breakthrough pig made of lead. The pig is usually thick enough to shield all the technetium photons but only a fraction of the molybdenum photons. The manufacturer will specify the Mo-99 correction factor to convert from measured Mo-99 to total Mo-99.

The following model procedure may be used to measure the molybdenum concentration in Mo-99/Tc-99m generator elution. If you will follow the model procedure, you may say on your application, "We will establish and implement the model procedure for measuring and recording molybdenum concentration that was published in Appendix M.3 to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own molybdenum concentration procedure for review. If you do so, you should consider for inclusion all the features in the model procedure and carefully review the requirements of § 35.204. Say on your application, "We have developed a procedure for measuring and recording molybdenum concentration for your review that is appended as ATT 10.10," and append your procedure for measuring and recording molybdenum concentration.

#### MODEL PROCEDURE

Each time a generator is eluted, make a record of the:

1. Date the generator was received;
2. Date and time of elution;
3. Measured Mo-99 activity in microcuries;
4. Product of the measured Mo-99 activity and the correction factor noted by the molybdenum breakthrough pig manufacturer;
5. Measured Tc-99m activity in millicuries;
6. Ratio of the total Mo-99 microcuries per millicurie of Tc-99m and check-mark that the ratio is less than 0.07 microcurie of Mo-99 per millicurie of Tc-99m. (If it isn't, stop and notify the RSO. In conformance with paragraph 21.21(b) of 10 CFR Part 21, the licensee must notify the NRC if

a leaking generator is detected.) [The 0.07 action level allows for the quicker decay of the Tc through the day of use. It is assumed that the material will be used within 6 hours, at which time the concentration of Mo-99 to Tc-99m would have doubled.]

7. Initials of the person who made the record.

#### M.4 Keeping an Inventory of Implant Sources (§§ 30.51, 35.21, 35.406)

You may use the following model procedure to keep an inventory and use record for implant sources. If you will follow the model procedure, you may say on your application, "We will establish and implement the model procedure for keeping an inventory of implant sources that was published in Appendix M.4 to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own procedure for keeping an inventory and use record for implant sources. If you do so, you should consider for inclusion all the features in the model system and carefully review the requirements of §§ 30.51, 35.21, and 35.406. Say on your application, "We have developed a procedure for keeping an inventory of implant sources for your review that is appended as ATT 10.11," and append your procedure for keeping an inventory and use record for implant sources.

#### MODEL PROCEDURE

1. Use a locking installed cabinet or safe to store all implant sources.
2. Make a list of names of those individuals you allow to handle implant sources and have them initial beside their names.
3. For long-lived sources, draw a map of the storage drawer and indicate the activity of the source at each storage point. For short-lived sources that you store in the manufacturer's shipping container, indicate the area in the safe where you put the container. Also, be sure to add the sources to the inventory log.
4. Post the map and the list of individuals whom you permit to handle the sources in the storage area or on the inventory log.
5. Each time you remove a source, make a record of the number and activity of sources removed, the room number of use or patient's name, and the time and date they were removed from storage; initial the record.
6. Each time you return sources to storage, immediately count them to ensure that every source removed has been returned. Then make a record of the number and activity of sources returned, the room number of use or patient's name, and the time and date they were returned to storage; initial the record.
7. If you ever perceive a discrepancy between the record and the number of sources in use and in storage, notify the RCO immediately.

See Exhibit 15 for a sample form you may want to use.



## APPENDIX N

### Model Procedure for Area Surveys (See § 35.70.)

You may use the following model procedure to perform area surveys. If you follow the model procedure, you may say on your application, "We will establish and implement the model procedure for area surveys that was published in Appendix N to Regulatory Guide 10.8, Revision 2."

You may develop your own procedure for review. If you do so, you should consider for inclusion all the features in the model procedure and carefully review the requirements of § 35.70. Say on your application, "We have developed survey procedures for your review that are appended as ATT 10.12," and append your survey procedures.

#### MODEL PROCEDURE

##### Ambient Dose Rate Surveys

1. Survey Areas
  - a. In radiopharmaceutical elution, preparation, and administration areas, survey at the end of each day of use with a radiation detection survey meter. If diagnostic administrations are occasionally made in patients' rooms and special care is taken to remove all paraphernalia, those rooms need not be surveyed.
  - b. In laboratory areas where only small quantities of gamma-emitting radioactive material are processed (less than 200 microcuries at a time), survey monthly with a radiation detection survey meter.
  - c. In radiopharmaceutical storage and radiopharmaceutical waste storage areas, survey weekly with a radiation detection survey meter.
  - d. In sealed source and brachytherapy storage areas, survey quarterly with a radiation measurement survey meter.
2. Immediately notify the RSO if you find unexpectedly high or low levels.

##### Removable Contamination Surveys

1. Survey Areas
  - a. In radiopharmaceutical elution, preparation, and administration areas, survey weekly for removable contamination. If diagnostic administrations are occasionally made in patients' rooms and special care is taken to remove all paraphernalia, those rooms need not be surveyed.
  - b. In laboratory areas where only small quantities of photon-emitting radioactive material are processed (less than 200 microcuries at a time), survey monthly for removable contamination.

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- c. In radiopharmaceutical storage and radiopharmaceutical waste storage areas, survey weekly for removable contamination.
2. The wipe sample assay procedure should be sufficiently sensitive to detect the presence of 2000 dpm/100 cm<sup>2</sup> of removable contamination (200 dpm/100 cm<sup>2</sup> for isotopes of iodine). You must use a radioactive source with a known amount of activity to convert sample measurements (usually in counts per minute or cpm) to disintegrations per minute or dpm.
3. Immediately notify the RSO if you find unexpectedly high levels.

#### Records

1. Keep a record of dose rate and contamination survey results. It must include the following information:
  - a. The date, area surveyed, and equipment used.
  - b. The name or initials of the person who made the survey.
  - c. A drawing of the areas surveyed with contamination and dose rate action levels as established by the RSO. (Recommended removable surface contamination action levels are published in Regulatory Guide 8.23, "Radiation Safety Surveys at Medical Institutions." See Regulatory Guide 8.23 or Table N-1 below for guidance in establishing your action levels.)
  - d. Measured dose rates in mR/hr or contamination levels in dpm/100 cm<sup>2</sup>, as appropriate.
  - e. Actions taken in the case of excessive dose rates or contamination and followup survey information.
2. The RSO will review and initial the record at least monthly and also promptly in those cases in which action levels were exceeded.

The following information is not part of the model procedure.

See Exhibit 16 for a sample record form.

Table N-1

Recommended Action Levels in dpm/100 cm<sup>2</sup> for Surface  
Contamination by Radiopharmaceuticals

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	P-32, Co-58, Fe-59, Co-60, Se-75, Sr-85, In-111, I-123, I-125, I-131, Yb-169, Au-198	Cr-51, Co-57, Ga-67, Tc-99m, Hg-197, Tl-201
1. Unrestricted areas, personal clothing	200	2,000
2. Restricted areas, protective clothing used only in restricted areas, skin	2,000	20,000

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## APPENDIX O

### Model Procedure for Monitoring, Calculating, and Controlling Air Concentrations

(See §§ 20.103, 20.106, 20.201, 35.90, and 35.205.)

#### WORKER DOSE FROM NOBLE GASES (Item 10.13.1)

Noble gases such as xenon in the air present an external source of radiation exposure that must be calculated. Many commercially available dosimeters and survey instruments are not capable of accurately measuring worker doses from immersion in noble gases.

If you will collect spent gas in a shielded trap with an effluent air contamination monitor and will follow the monitor manufacturer's instructions for checking its accuracy and constancy, you may respond to Item 10.13.1 by saying, "We will collect spent noble gas in a shielded trap and monitor the trap effluent with an air contamination monitor that we will check regularly according to the manufacturer's instructions."

If you will collect spent gas in a shielded trap and will follow the model procedure for checking trap effluent, you may respond to Item 10.13.1 by saying, "We will collect spent noble gas in a shielded container and will establish and implement the model procedure for checking trap effluent that was published in Appendix O.3 to Regulatory Guide 10.8, Revision 2."

If you are not monitoring trap effluent or if you exhaust spent gas to the atmosphere, you must estimate worker dose by calculation. (You do not have to submit the calculations, but you should keep them for NRC review during inspections.) If you will follow the model procedure below for calculating worker dose from noble gases, you may respond to Item 10.13.1 by saying, "We will follow the model procedure for calculating worker dose from noble gases that was published in Appendix O.1 to Regulatory Guide 10.8, Revision 2."

If none of the above apply, you may develop your own procedure for review. If you do so, you should consider all the above information and carefully review the requirements of §§ 20.103, 20.201, 35.90, and 35.205. Say on your application, "We have developed a procedure for monitoring worker dose due to submersion in noble gases that is appended as ATT 10.13.1," and append your procedure for monitoring worker dose from noble gases.

#### WORKER DOSE FROM AEROSOLS (Item 10.13.2)

If you will collect spent aerosol in a shielded trap, will use an air contamination monitor for reusable traps, and will follow the monitor manufacturer's instructions for checking for accuracy and constancy, you may respond to Item 10.13.2 by saying, "We will collect spent aerosol in a shielded trap and, for reusable traps, monitor the trap effluent with an air contamination monitor that we will check regularly according to the manufacturer's instructions." You do not have to monitor the trap effluent of single-use devices.

If you are not monitoring reusable trap effluent or if you are exhausting spent aerosol to the atmosphere, you must estimate worker dose by calculation. ~~(You do not have to submit the calculations, but you should keep them for NRC~~



review during inspections.) If you will follow the model procedure below for calculating worker dose from aerosols, you may respond to Item 10.13.2 by saying, "We will follow the model procedure for calculating worker dose from aerosols that was published in Appendix 0.1 to Regulatory Guide 10.8, Revision 2."

If neither of the above apply, you may develop your own procedure for review. If you do so, you should consider all the above information and carefully review the requirements of §§ 20.103, 20.106, 20.201, 35.90, and 35.205. Say on your application, "We have developed a procedure for monitoring worker dose due to aerosol concentrations that is appended as ATT 10.13.2," and append your procedure for monitoring worker dose from aerosols.

#### 0.1 MODEL PROCEDURE FOR CALCULATING WORKER DOSE FROM CONCENTRATIONS OF GASES AND AEROSOLS IN WORK AREAS

1. Collect the following data:
  - a. Estimated number of studies per week;
  - b. Activity to be administered per study;
  - c. Estimated activity lost to the work areas per study (you may assume 20 percent loss);
  - d. Measured airflow supplied by each vent in the imaging room (if different during heating and cooling seasons, use the lesser value);
  - e. Measured airflow exhausted by each vent in the imaging room (the exhaust should be vented and not recirculated within the facility);
  - f. Measured airflow exhaust at the storage site (e.g., a fume hood); and
  - g. Maximum permissible air concentrations in restricted and unrestricted areas. For Xe-133, the maximum permissible values are  $1 \times 10^{-5}$   $\mu\text{Ci}/\text{ml}$  in restricted areas and  $3 \times 10^{-7}$   $\mu\text{Ci}/\text{ml}$  in unrestricted areas. For soluble Tc-99m, the maximum permissible values are  $4 \times 10^{-5}$   $\mu\text{Ci}/\text{ml}$  in restricted areas and  $1 \times 10^{-6}$   $\mu\text{Ci}/\text{ml}$  in unrestricted areas. For other gases or aerosols, see Appendix B to 10 CFR Part 20.
2. The following calculations must be made:
  - a. The sum of all measured exhaust rates and the sum of all measured supply rates. If the former is larger than the latter, this ensures that the imaging room is at negative pressure.
  - b. The estimated average concentration in restricted areas.
    - (1) The total activity released to the restricted area (activity used each week multiplied by estimated fractional loss per study) divided by the total air exhausted (sum of all exhaust rates multiplied by the length of the work week) must be less than the applicable maximum permissible value for a restricted area.

- (2) If this is not the case, plan for fewer studies. (An increase in the ventilation rate will not significantly reduce the downwind effluent concentration because it is primarily a function of the natural dispersion in the atmosphere.)

## 0.2 MODEL PROCEDURE FOR CALCULATING AIRBORNE EFFLUENT CONCENTRATION

1. Divide the total activity released to an unrestricted area (activity used each week that is released in an exhaust system) by the total volume of air exhausted over the week ("on" time multiplied by measured airflow rate). The quotient must be less than the applicable maximum permissible value for an unrestricted area.
2. If this is not the case, plan for fewer studies and do the calculation again. Alternatively, you may consider collection and decay-in-storage for waste, or restriction of access to the release point and calculation of concentration at the boundary of the restricted area.

## 0.3 MODEL PROCEDURE FOR MONITORING OR CHECKING TRAP EFFLUENT

Charcoal traps can significantly reduce air contamination. They can also become saturated or be spoiled by improper use, humidity, chemicals, or inadequate maintenance.

1. If the trap effluent is monitored by a radiation detector designed to monitor effluent gas, check the detector according to the manufacturer's instructions and keep a record of the checks.
2. If you do not monitor the trap effluent, check it on receipt and once each month. Collect the effluent from the trap during one patient study in a plastic bag and then monitor the activity in the bag by holding the bag against a camera, with the camera adjusted to detect the noble gas, and compare its counts per minute (cpm) to background cpm with no other radioactivity in the area. Keep a record of the date, background cpm, and bag cpm.
3. The RSO will establish an action level based on cpm or a multiple of background cpm. If you measure a significant increase in the bag cpm, the trap is breaking down and must be replaced.
4. Follow the trap manufacturer's instructions for replacing the trap.

## PUBLIC DOSE FROM AIRBORNE EFFLUENT (ITEM 10.13.3)

Effluent release presents a potential source of dose to the public. Usually a calculation of concentration at the release point is done and compared to the appropriate value of Table II of Appendix B to 10 CFR Part 20.

If you are not directly venting aerosols and gases to the atmosphere, you may respond to Item 10.13.3 by saying, "We will not directly vent spent aerosols and gases to the atmosphere and therefore no effluent estimation is necessary."

If you are going to vent aerosols or gases to the atmosphere, you must estimate effluent concentrations by calculation. (You do not have to submit

the calculations with your application, but you should keep them for NRC review during inspections.) If you will follow the model procedure below for calculating release concentrations, you may respond to Item 10.13.3 by saying, "We will follow the model procedure for calculating airborne effluent concentration that was published in Appendix 0.2 to Regulatory Guide 10.8, Revision 2."

If neither of the above apply, you may develop your own procedure for review. If you do so, you should consider all the above information and carefully review the requirements of §§ 20.106, 20.201, 35.90, and 35.205. Say on your application, "We have developed a procedure for monitoring airborne effluent concentration that is appended as ATT 10.13.3," and append your procedure for monitoring airborne effluent concentration.

#### SPIILLED GAS CLEARANCE TIME (Item 10.13.4)

Because normal room ventilation is usually not sufficient to ensure timely clearance of spilled gas, the calculations described in Appendix 0.4 should be done to determine for how long a room should be cleared in case of a gas spill. This clearance time should be posted in the room.

If you will calculate spilled gas clearance times according to the following procedure, you may respond to Item 10.13.4 by saying, "We will calculate spilled gas clearance times according to the procedure that was published in Appendix 0.4 to Regulatory Guide 10.8, Revision 2."

You may develop your own procedure for review. If you do so, you should consider all the above information and carefully review the requirements of § 35.205. Say on your application, "We have developed a procedure for calculating spilled gas clearance times that is appended as ATT 10.13.4," and append your procedure.

#### 0.4 MODEL PROCEDURE FOR CALCULATING SPIILLED GAS CLEARANCE TIME

1. Collect the following data:
  - a. A, the highest activity of gas in a single container, in microcuries;
  - b. Measured airflow supply from each vent in the room (if different during heating and cooling seasons, use the lesser value), in milliliters per minute;
  - c. Q, the total room air exhaust determined by measuring, in milliliters per minute, the airflow to each exhaust vent in the room (the exhaust should be vented and not recirculated within the facility); this may be either the normal air exhaust or a specially installed gas exhaust system;
  - d. C, the maximum permissible air concentrations in restricted and unrestricted areas. For Xe-133, the maximum permissible values are  $1 \times 10^{-5}$   $\mu\text{Ci/ml}$  in restricted areas and  $3 \times 10^{-7}$   $\mu\text{Ci/ml}$  in unrestricted areas. For other gases, see Appendix B to 10 CFR Part 20; and
  - e. V, the volume of the room in milliliters.



2. For each room make the following calculations:

a. The airflow supply should be less than the airflow exhaust to ensure the room is at negative pressure.

b. The evacuation time  $t = \frac{-V}{Q} \times \ln (C \times V/A)$ .

## APPENDIX P

### Model Procedure for Radiation Safety During Iodine Therapy Over 30 Millicuries (See §§ 35.300, 35.75, and 20.105.)

You may use the following procedure for reducing worker and public dose during radiopharmaceutical therapy. If you will follow the model procedure, you may say on your application, "We will establish and implement the model procedure for radiation safety during radiopharmaceutical therapy that was published in Appendix P to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own procedure for review. If you do so, you should consider for inclusion all the features in the model procedure and carefully review the requirements of §§ 19.12, 20.105, 35.75, and 35.300. Say on your application, "We have developed a procedure for radiation safety during therapeutic use of radiopharmaceuticals for your review that is appended as ATT 10.14," and append your procedure.

#### MODEL PROCEDURE

1. The patient's room will be as far away from the nursing station and heavy traffic hallways as is consistent with good medical care. It will be a private room with private sanitary facilities and should be without carpet.
2. Prepare the room for the procedure as follows:
  - a. Use leak-proof absorbent paper to cover large surfaces (the bed, chairs, and the floor around the toilet) that are likely to be contaminated. Small items (telephone, door knobs, bed remote control, television control, and nurse call cord) may be covered with absorbent paper or plastic bags.
  - b. Prepare separate boxes for linen, disposable waste, and nondisposable contaminated items. Place a single large reclosable plastic bag in each box, or supply several small plastic bags.
  - c. Determine whether urine will be discarded by release to the sanitary sewer or collected. If urine will be collected, prepare collection containers.
    - (1) Containers should be unbreakable and closable.
    - (2) If there is no need for assay or volumetric determination and urine will be decayed in storage, add to each container an absorbent such as vermiculite.
    - (3) To avoid room contamination in the case of a spill, place containers in a box or deep tray that has been lined with a plastic bag and absorbent paper or vermiculite.
    - (4) Supply a few half-value layers of shielding for each container. (For I-131, one half-value layer is approximately 3 mm of lead.)
    - (5) Supply a wide-mouth antispash funnel.

- d. Stock additional disposable gloves, absorbent paper, and radioactive waste labels in the room for use as necessary by nursing, nuclear medicine, and radiation safety personnel.
3. Order disposable table service for the duration of the patient's stay. Inform the Housekeeping Office that personnel should stay out of the room until otherwise notified.
4. Supply the nurses with film badges, TLDs, or pocket ionization chambers.
5. Brief the nurses on radiation safety precautions. Use the sample form, "Nursing Instructions for Patients Treated with Iodine-131, Phosphorus-32, or Gold-198" (Exhibit 17), or your own nursing instruction form as an outline. Allow time for questions and answers during the briefing. Leave a written copy of the radiation safety precautions in the patient's chart or at the nurses' station.
6. Brief the patient on radiation safety procedures for the dosage administration, visitor control, urine collection, radioactive waste, and other items as applicable.
7. Only those persons needed for medical, safety, or training purposes should be present during the administration.
8. Mark a visitors' "safe line" on the floor with tape as far from the patient as possible.
9. Following administration of the dosage, measure the exposure rate in mR/hr at bedside, at 1 meter from bedside, at the visitors' "safe line," and in the surrounding hallways and rooms (the last rates must conform to requirements in paragraph 20.105(b)). Record this and any other necessary information on the nursing instructions form or the nurses' dosimeter signout form. Post the room with a "Radioactive Materials" sign.
10. For patients treated with liquid or gelatin-capsuled I-131, 1 day after the dosage administration, measure the thyroid burden of all personnel who were present for the administration. Also consider a thyroid burden assay for patient care personnel 2 days after the administration. Make a record of the worker's name, amount of I-131 activity in a thyroid phantom in microcuries and associated counts per minute, the counts per minute from the worker's thyroid, the calculated thyroid burden, and date.
11. As the therapy proceeds, pick up waste for transfer to a decay-in-storage or decontamination area.
12. Do not release any patient until either the exposure rate from the patient is less than 5 millirem per hour at 1 meter or the retained radioactivity is less than 30 millicuries (see § 35.75). If you use the exposure rate standard as the release criterion, measure it with a radiation measurement survey meter at a distance of 1 meter from the umbilicus while the patient is standing or, if the patient is not ambulatory, 1 meter from the bedside with the patient supine.



13. Before using the room for general occupancy, it must be decontaminated and released to the Admitting Office.
  - a. Remove all absorbent paper, and place it in the appropriate container.
  - b. Transfer all containers to a decay-in-storage or decontamination area.
  - c. Use a radiation detection survey meter to check for room contamination. Clean contaminated areas until removable contamination is less than 200 dpm/100 cm<sup>2</sup>.
  - d. Call the Housekeeping Office to remove the cleaning restriction and call the Admitting Office to return the room to the vacant list.

Exhibit 18, "Radiation Safety Checklist for Iodine Therapy over 30 Millicuries," may also be helpful to you.

## APPENDIX Q

### Model Procedure for Radiation Safety During Implant Therapy (See §§ 35.75, 35.404, and 35.406.)

You may use the following procedure to reduce worker and public dose during implant therapy. If you will follow the model procedure, you may say on your application, "We will establish and implement the model procedure for radiation safety during implant therapy that was published in Appendix Q to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own procedure for review. If you do so, you should consider for inclusion all the features in the model procedure and carefully review the requirements of §§ 19.12, 20.105, 35.75, 35.404, and 35.406. Say on your application, "We have developed a procedure for radiation safety during implant therapy for your review that is appended as ATT 10.15," and append your procedure.

You may find a checklist to be helpful, such as Exhibit 19, "Radiation Safety Checklist for Temporary Implant Therapy."

#### MODEL PROCEDURE

1. The patient's room will be as far away from the nursing station and heavy traffic hallways as is consistent with good medical care. It will be a private room unless the dose at one meter from the implant meets the requirements in paragraph 20.105(b) of 10 CFR Part 20.
2. Supply the nurses with film badges, TLDs, or pocket ionization chambers.
3. Brief the nurses on radiation safety precautions. Use the sample form, "Nursing Instructions for Patients Treated With Temporary Implant Sources," Exhibit 20, or your own nursing instruction form as an outline. Allow time for questions and answers during the briefing.
4. Brief the patient on radiation safety procedures for confinement to bed, visitor control, and other items as applicable consistent with good medical care.
5. Only those persons needed for medical, safety, or training purposes should be present during the implant procedure.
6. Mark a visitors' "safe line" on the floor with tape as far from the patient as possible.
7. Following the implant, measure the exposure rate in mR/hr at bedside, at 1 meter from bedside, at the visitors' "safe line," and in the surrounding hallways and rooms (the last rates must conform to requirements in paragraph 20.105(b)). Record this and any other necessary information on the nursing instruction form or the nurses' dosimeter signout form. Post the room with a "Radioactive Materials" sign.
8. Do not release any patient who has received a temporary implant from the hospital until both a radiation survey of the patient and a count of

implant sources, trains, or ribbons confirms that all sources have been removed from the patient and are accounted for. Perform this check immediately after the removal of the sources. Keep a record confirming the source count and radiation survey on the implant source running inventory form. For low-activity seeds (less than 1 millicurie), use an individual seed to check the survey meter to be sure it will easily detect a seed that has not been removed or has been lost.

9. Do not release any patient who has received a permanent implant from the hospital until the exposure rate from the patient is less than 5 mR/hr at 1 meter. Measure this exposure rate with a radiation measurement survey meter at a distance of 1 meter from the umbilicus with the patient standing.

You may want to use the sample forms in Exhibit 19, "Radiation Safety Checklist for Temporary Implant Therapy," Exhibit 20, "Nursing Instructions for Patients Treated with Temporary Implant Sources," and Exhibit 21, "Sample Cesium Implant Source Log."



## APPENDIX R

### Model Procedure for Waste Disposal (See §§ 20.301, 20.303, 20.306, and 35.92.)

The following general guidance and procedure may be used for disposal of radioactive waste. If you follow all the general guidance and procedures, you may say on your application, "We will establish and implement the general guidance and model procedures for waste disposal that were published in Appendix R to Regulatory Guide 10.8, Revision 2."

If you prefer, you may develop your own procedure for review. If you do so, you should consider for inclusion all the features in the general guidance and models and carefully review the requirements of §§ 20.301, 20.303, 20.306, and 35.92. Say on your application, "We have developed a procedure for waste disposal for your review that is appended as ATT 11.1," and attach your procedure.

#### Overview

There are four commonly used methods of waste disposal: release to the environment through the sanitary sewer or by evaporative release; decay-in-storage (DIS); transfer to a burial site or back to the manufacturer; and release to in-house waste. With the exception of the patient excreta (see paragraph 20.303(d)) and generally licensed in vitro kit exemptions (see paragraph 31.11(f)), nothing in these guidelines relieves the licensee from maintaining records of the disposal of licensed material. (See paragraphs 30.51(a) and 20.401(c)(3).)

#### General Guidance

1. All radioactivity labels must be defaced or removed from containers and packages prior to disposal in in-house waste. If waste is compacted, all labels that are visible in the compacted mass must be defaced or removed.
2. Remind employees that nonradioactive waste such as leftover reagents, boxes, and packing material should not be mixed with radioactive waste.
3. Occasionally monitor all procedures to ensure that radioactive waste is not created unnecessarily. Review all new procedures to ensure that waste is handled in a manner consistent with established procedures.
4. In all cases, consider the entire impact of various available disposal routes. Consider occupational and public exposure to radiation, other hazards associated with the material and routes of disposal (e.g., toxicity, carcinogenicity, pathogenicity, flammability), and expense.

#### MODEL PROCEDURE FOR DISPOSAL OF LIQUIDS AND GASES

Liquids may be disposed of by release to the sanitary sewer or evaporative release to the atmosphere. This does not relieve licensees from complying with other regulations regarding toxic or hazardous properties of these materials.

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1. Regulations for disposal in the sanitary sewer appear in § 20.303. Material must be readily soluble or dispersible in the water. There are daily and monthly limits based on the total sanitary sewerage release of your facility. (Excreta from patients undergoing medical diagnosis or therapy is exempt from all the above limitations; see paragraph 20.303(d).) Make a record of the date, radionuclide, estimated activity that was released (in millicuries or microcuries), and of the sink or toilet at which the material was released.
2. Limits on permissible concentrations in effluents to unrestricted areas are enumerated in Table II of Appendix B to 10 CFR Part 20. These limits apply at the boundary of the restricted area. Make a record of the date, radionuclide, estimated activity that was released (in millicuries or microcuries) and estimated concentration, and of the vent site at which the material was released.
3. Liquid scintillation-counting media containing 0.05 millicurie per gram of H-3 or C-14 may be disposed of without regard to its radioactivity (§ 20.306). Make a record of the date, radionuclide, estimated activity (in millicuries or microcuries), calculated concentration in microcuries per gram, and how the material was disposed of.

#### MODEL PROCEDURE FOR DISPOSAL BY DECAY-IN-STORAGE (DIS)

Short-lived material (physical half-life less than 65 days) may be disposed of by DIS. If you use this procedure, keep material separated according to half-life.

1. Consider using separate containers for different types of waste, e.g., capped needles and syringes in one container, other injection paraphernalia such as swabs and gauze in another, and unused dosages in a third container. Smaller departments may find it easier to use just one container for all DIS waste. Because the waste will be surveyed with all shielding removed, the containers in which waste will be disposed of must not provide any radiation shielding for the material.
2. When the container is full, seal it with string or tape and attach an identification tag that includes the date sealed, the longest-lived radioisotope in the container, and the initials of the person sealing the container. The container may then be transferred to the DIS area.
3. Decay the material for at least 10 half-lives.
4. Prior to disposal as in-house waste, monitor each container as follows:
  - a. Check your radiation detection survey meter for proper operation;
  - b. Plan to monitor in a low-level (less than 0.05 millirem per hour) area;
  - c. Remove any shielding from around the container;
  - d. Monitor all surfaces of each individual container;

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- e. Discard as in-house waste only those containers that cannot be distinguished from background. Record the date on which the container was sealed, the disposal date, and type of material (e.g., paraphernalia, unused dosages). Check to be sure no radiation labels are visible.
  - f. Containers that can be distinguished from background radiation levels must be returned to the storage area for further decay or transferred for burial.
5. If possible, Mo-99/Tc-99m generators should be held 60 days before being dismantled because of the occasional presence of a long-lived contaminant. When dismantling generators, keep a radiation detection survey meter (preferably with a speaker) at the work area. Dismantle the oldest generator first, then work forward chronologically. Hold each individual column in contact with the radiation detection survey meter in a low-background (less than 0.05 mR/hr) area. Log the generator date and disposal date for your waste disposal records. Remove or deface the radiation labels on the generator shield.

#### MODEL PROCEDURE FOR TRANSFER FOR BURIAL

Except for material suitable for DIS and some animal carcasses, solids must be transferred to a burial site. Follow the packaging instructions you received from the transfer agent and the burial site operator. For your record of disposal, keep the consignment sheet that the transfer agent gave you.

#### MODEL PROCEDURE FOR RELEASE TO IN-HOUSE WASTE

Waste from in vitro kits that are generally licensed pursuant to § 31.11 is exempt from waste disposal regulations. Radioactive labels should be defaced or removed. There is no need to keep any record of release or make any measurement.

#### MODEL PROCEDURE FOR RETURNING GENERATORS TO THE MANUFACTURER

Used Mo-99/Tc-99m generators may be returned to the manufacturer. This permission does not relieve licensees from the requirement to comply with 10 CFR Part 71 and Department of Transportation (DOT) regulations.

1. Retain the records needed to demonstrate that the package qualifies as a DOT Specification 7A container (see DOT regulations, paragraph 173.415(a) of 49 CFR Part 173).
2. Assemble the package in accordance with the manufacturer's instructions.
3. Perform the dose rate and removable contamination measurements required by paragraph 173.475(i) of 49 CFR Part 173.
4. Label the package and complete the shipping papers in accordance with the manufacturer's instructions.

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