

THOMAS JEFFERSON UNIVERSITY

Vice President for Health Services
and Hospital Director



Philadelphia, 19107
(215) 928-8383

July 29, 1981

James J. Joyner, Chief
Technical Inspection Branch
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Re:
License # - 37-00148-06
Inspection # - 81-01
Docket # - 30-02941

Dear Mr. Joyner:

This is in reply to your letter of July 1, 1981 about the safety inspection of our institution conducted by Dr. Laurence Friedman of your office on April 23, 1981, and more specifically to the item of noncompliance identified in Appendix A of that letter. Your letter was reviewed by the members of our University Radiation Safety Committee and it is their unanimous opinion that there has been no violation of NRC regulations. The reasons given are as follows:

- 1) Our Office of Radiation Safety, in conjunction with the Department of Radiation Therapy and Nuclear Medicine, the Department of Nursing, Central Scheduling and Hospital Administration, has developed a program whereby brachytherapy patients are assigned to specific rooms in two sections of the 7th floor New Hospital building. These rooms and the adjoining rooms are classified as restricted areas in accordance with the definition of "restricted area" in 10 CFR 20.3(14).
- 2) Calculations and radiation surveys have established that patients in the adjoining rooms have not and are unlikely to receive

8202160692 820129
PDR ADOCK 04008073
C PDR

July 29, 1981

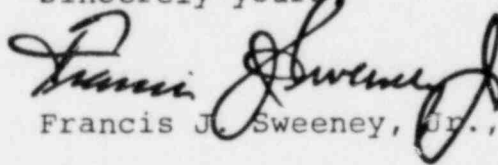
500 mrem during their hospital stay (see attached example). These surveys have been conducted according to 10 CFR 20.201(a).

- 3) By written directive from the Thomas Jefferson University Office of Radiation Safety the admission of the type of patient to these rooms is controlled. No pregnant women or children under the age of 18 are admitted as patients.
- 4) All nurses in these areas of the hospital are monitored by means of film badges and over the years there has been no instance of any nurse exceeding 10% of the MPD.
- 5) The guidelines that we are using for radiation doses to patients in the adjoining rooms are those contained in the NRC's NUREG-0267 as well as in the NCRP Reports Nos. 37, 39 and 40.

The Committee has noted your statement that we may apply to the NRC for an amendment to our license, pursuant to 10 CFR 20.105(a), for approval of the control procedures now in use. We understand that 10 CFR 20.105(a) deals with unrestricted areas whereas the rooms under discussion are restricted areas in accordance with 10 CFR 20.3(14).

In view of the above, it is our belief that we are in compliance with NRC regulations and that no further action is necessary. However, if further information is required, please feel free to call Benjamin Galkin, Thomas Jefferson University Director of Radiation Safety, at 928-7813.

Sincerely yours



Francis J. Sweeney, Jr., M.D.

FJS/BG:b
Attachment

cc: Dr. L. W. Bluemle, President
Thomas Jefferson University

Dr. W. F. Kellow, Dean
Jefferson Medical College

Members of the University
Radiation Safety Committee

CESIUM

N

INTRACAVITARY
APPLICATION
(~200mCi)

windown

+
2.0

32

bed

1500

30

10

5.5

2.0

1.5

30

1m

1m

2m

3m

80mg Rn. equivalent

ROOM 7015W

E

1m

~ 4 meters

3

HVL = 12cm

with

ie. one wall

Thickness = 1 HVL

2m

Bathroom - shower

< 0.3

< 0.3

1.5
(1.3 cloud)

SCALE

0.25m = 1cm

Readings in mR/hr.

(VICT 470A & 491 QTP)

CALIBRATED AGAINST
RADIUM STANDARD

< 0.2

< 0.2

Using Station

< 0.2

R.O. Gerson 2/05/80