

**ONCOLOGY SERVICES CORPORATION**

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(412) 463-3570

December 15, 1993

VIA TELECOPY: 215-337-5269

Ronald R. Bellamy, Ph.D.  
Chief, Nuclear Materials Safety Branch  
NRC Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

Re: OSC - Permanent Relaxation of License

Dear Dr. Bellamy:

If possible, I would like to schedule a telephone conference with you and your staff at your earliest convenience to determine if the NRC will require any further information regarding the permanent relaxation issue.

I will be out of the office tomorrow but could have a call this Friday morning, next Monday, December 20, 1993 or next Tuesday, December 21, 1993.

My secretary will be in my office all day tomorrow.  
Thank you for your assistance.

Very truly yours,

*Marcy L. Colkitt*  
Marcy L. Colkitt  
General Counsel

MLC/sjg

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PDR ADOCK 03031765  
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Docket No. 030-31765

License No. 37-28540-01

Oncology Services Corporation  
ATTN: Douglas R. Colkitt, M.D.  
President  
110 Regent Court, Suite 100  
State College, Pennsylvania 16801

Dear Dr. Colkitt:

Subject: REQUEST FOR RELAXATION OF ORDER SUSPENDING LICENSE

This letter refers to our previous letter dated November 4, 1993 and to your reply letter dated December 7, 1993. We have reviewed your reply and require the following additional information with regard to the technical aspects of your request:

1. As stated in our letter, we do not plan to consider your requests for individual licenses at each of your facilities until we have relaxed the Order to permit full operation of your current operation. In order for us to consider complete relaxation we must be assured you will have adequate Radiation Safety Officer (RSO) oversight. It may be possible for you to accomplish this by delegating radiation safety officer duties to individual physicians at each site, however, we would require that one individual be named as the RSO on the license who is fully accountable for all duties and responsibilities of the RSO as required under 10 CFR 35. The RSO may employ independent consultants to assist in the corporate oversight, including annual audits, but the RSO will retain responsibility for assuring this oversight. Please provide the following information about your audit program: a) describe the elements of the RSO audits; b) indicate the time expected to complete each audit; and c) describe the records that will be kept of your audit activities at each of your facilities.
2. Please provide additional information on the training of HDR operators. Your letter states that you believe the manufacturers' training was completed by previously referenced medical physicists. You must, however, confirm that each HDR operator will be provided device-specific manufacturers' training or you should propose an equivalent training program. Because your license presently authorizes three different HDR units your operators may need to have completed three different manufacturers training programs.

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RETURN ORIGINAL TO  
REGION I

IE:07

Enclosure 6

Oncology Services Corporation


-2-

3. Confirm that the HDR checks referred to in Item 18 of your letter will be performed prior to use, but no earlier than 30 days before use. Additionally, you have not provided a copy of the actual procedures for determining source position accuracy as requested in our letter. You have indicated that if source position tests exceed +/- 1 mm that the authorized user will be informed. Confirm that the RSO will also be informed.
4. In Item 19 of your letter you have indicated that the authorized user or the physicist will review the results of calibrations prior to performing patient treatment. Confirm that the RSO or the physicist will review the results prior to patient treatment.
5. With regard to your HDR calibration procedures, please confirm that your electrometer and chamber are calibrated by the National Institute of Standards and Technology or by a calibration laboratory accredited by the American Association of Physicists in Medicine. You should also provide a reference for your calibration methodology.
6. In support of your request to add Tillman K. Saylor, Ph.D. and to authorize Anirul Hoque to perform HDR calibrations, additional information will be required. It is unclear from the information you have provided if these individuals have had one year of full-time training in therapeutic radiological physics and an additional year of full time work experience under the supervision of a medical physicist at a medical facility that includes performing the tasks in utilizing an HDR unit. Please describe the training and experience of these individuals in greater detail.
7. Please describe in detail your method for performing a source inventory at each usage and calibration.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office. If you have any technical questions regarding this letter, please call Thomas K. Thompson at (215) 337-5303.

Sincerely,

Original Signed By  
Susan Frant Shankman

 Charles W. Hehl, Director  
Division of Radiation Safety  
and Safeguards

Oncology Services Corporation

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cc:

Public Document Room (PDR)

Nuclear Safety Information Center (NSIC)

Commonwealth of Pennsylvania

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TOTAL P.04