



# University of Pittsburgh

*Radiation Safety Office*

Room G-7 Parran Hall  
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December 22, 1993

United States Nuclear Regulatory Commission  
ATTN: Jenny M. Johansen, Chief  
Medical Inspection Section  
Division of Radiation Safety and Safeguards  
475 Allandale Road  
King of Prussia, PA 19406-1415

License Nos. 37-00245-02  
37-00245-09  
37-00865-11

Subject: Routine Inspection Nos. 030-02945/93-001, 030-29418/93-001 and 030-22055/93-001

Dear Ms. Johansen:

The following is in response to your letter of November 17, 1993 regarding the NRC inspection of the University of Pittsburgh's facilities and radioactive materials licenses.

With respect to the three items cited:

- A. The Radiation Safety Office under the direction of the Radiation Safety Committee will provide to all authorized users of radioactive materials additional information regarding the security of radioactive materials. Effective this date issues related to security of radioactive materials will be emphasized in training sessions for new radioactive materials handlers, in retraining sessions and at the time of reauthorization to use such materials. The Radiation Safety Office will monitor for security compliance as part of our routine laboratory inspection program.
- B. In Attachment I of the amendment letter dated July 24, 1992 for our Radioactive Materials License #37-00245-02, we outlined the initial and annual refresher training which would be given to operators of the high dose rate remote afterloader. This amendment was approved and appended by reference to License Condition No. 25. As part of the operator training, instruction on emergency procedures will

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include "dry runs". Nucletron personnel provided initial training, including "dry runs" of emergency procedures, to our device operators on February 3, 1993.

Our internal safety program for operators of radiation therapy devices includes safety retraining every six months. This is in addition to the required annual training. This additional training is a subset of the basic training program and may include other safety related subjects. During the inspection, records of such a training session were reviewed. At the session in question emergency procedures were discussed but "dry runs" were not performed.

We contend that since no new operators were in attendance at this session and that by license condition retraining including "dry runs" is only required on an annual basis no license violation existed at the time of the inspection.

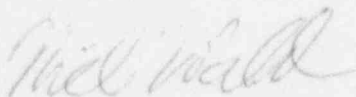
Hands on emergency training will be provided at the next annual session in February, 1994 and at any session involving new personnel.

- C. Our procedures for brachytherapy source use requires the use of a pin board which provides a visual indication of the number and activity of sources which have been removed from, and are remaining in, the brachytherapy source storage safe. This had been outlined as part of our existing program. In previous inspections, the use of the peg board system was noted, and we had been informed that upon renewal of our license that the new conditions in 10 CFR Part 35.406 would apply. Our broad scope license is under timely renewal.

We will modify our brachytherapy source use log to include the number and activity of sources remaining in storage after the removal or return of sources, and instruct the appropriate personnel in the recording of this information. Full compliance will be achieved by January 31, 1994.

We trust that this information will be acceptable to your office. If you have additional questions regarding this submittal, please contact Jerry Rosen at 412-624-2728.

Sincerely,



Niel Wald, M.D., Chairman  
Radiation Safety Committee



# University of Pittsburgh

*Radiation Safety Office*

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February 18, 1994

United States Nuclear Regulatory Commission  
ATTN: Pamela Henderson  
Nuclear Materials Safety Section D  
Division of Radiation Safety and Safeguards  
475 Allendale Road  
King of Prussia, PA 19406-1415

License No. 37-00245-02  
Docket No. 030-02945

Dear Ms. Henderson:

The following information is being provided as you requested during our phone conversation on February 15, 1994.

With respect to safety training of personnel related to the Nucletron HDR Unit:

The following personnel will receive annual emergency training on the HDR including hands on training on source recovery:

the physician in attendance,  
the unit operator and  
the medical physicist in attendance.

With respect to the counting and logging in of sources used for brachytherapy:

In addition to the use of the pin board, which was previously described, the number and activity of the sources removed, returned and remaining in storage will be visually determined and logged in accordance with 30CFR406.

If you have additional questions regarding this submittal please contact me at 412-624-2728.

Sincerely,

Jerry C. Rosen  
Radiation Safety Officer

cc: Niel Wald, M.D., Chairman  
Radiation Safety Committee