CITY OF PHILADELPHIA

DEPARTMENT OF PUBLIC HEALTH
OFFICE OF THE MEDICAL EXAMINER
321 University Avenue
Philadelphia, Pa. 19104

Telephone — 215-823-7470

ROBERT K. ROSS, M.D.
Health Commissioner

HARESH G. MIRCHANDANI, M.D.
Medical Examiner

030-06186

November 3, 1993

Dr. Mohamed Shanbaky
Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Dear Dr. Shanbaky:

Enclosed is a hard copy follow up for the Registration Certificate which was FAXed to you on November 3, 1993.

Thank you for your assistance in this matter. Please contact me (215-823-7450) if you have any questions.

Sincerely,

Barry Dickman

Barry Dickman
Executive Assistant

BD:jk

cc: H. Mirchandani, M.D.
G. Purnell
D. Kitchen

Enclosure

10 CFR 31

EXPIRES: 2/28/93

REGISTRATION CERTIFICATE—*in vitro* TESTING WITH BYPRODUCT MATERIAL UNDER GENERAL LICENSE

INSTRUCTIONS: TYPE OR PRINT (PRESS HARD -- MULTIPLE COPIES)

Section 31.11 of 10 CFR 31 establishes a general license authorizing physicians, clinical laboratories, hospitals, and veterinarians in the practice of veterinary medicine to possess certain small quantities of byproduct material for *in vitro* clinical or laboratory tests not involving the internal or external administration of the byproduct material or the radiation therefrom to human beings or animals. Possession of byproduct material under 10 CFR 31.11 is not authorized until the physician, clinical laboratory, hospital, or veterinarian in the practice of veterinary medicine, has filed NRC Form 483 and received from the Commission a validated copy of NRC Form 483 with a registration number.

NAME AND ADDRESS: (SEE ITEM 1.A.)

Dept. of Public Health
Medical Examiner's Office
321 University Ave.
Phila., PA 19104

TELEPHONE NUMBER: (215) 823-7450

2. APPLICATION

I hereby apply for a registration number pursuant to 10 CFR 31, Section 31.11, for use of byproduct materials for: *(Check one box only)*

	A. Myself, a duly licensed physician authorized to dispense drugs in the practice of medicine.
X	B. The above-named clinical laboratory.
	C. The above-named hospital.
	D. Veterinarian in the practice of veterinary medicine.

1. INSTRUCTIONS:

A. In the address box above, print or type the name and address (including ZIP Code) of the registrant physician clinical laboratory, hospital, or veterinarian in the practice of veterinary medicine for whom or for which this registration form is filed.

B. Submit this form and the two yellow copies to:
Medical, Academic and Commercial Use
Safety Branch (6H3)
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

(At NRC, a registration number will be assigned and a validated copy of NRC Form 483 will be returned.)

C. Retain the Registrant's Copy (white copy) for your files.

3. REGISTRATION

REGISTRATION NUMBER:

VALIDATED FOR THE
U.S. NUCLEAR REGULATORY COMMISSION _____
DATE

(If this is an initial registration, leave this space blank -- number to be assigned by NRC. If this is a change of information from a previously registered general license, include your registration number.)

4. If place of use is different from address listed above, give complete address:

5. CERTIFICATION

I hereby certify that:

A. All information in this registration certificate is true and complete.
B. The registrant has appropriate radiation measuring instruments to carry out the tests for which byproduct material will be used under the general license of 10 CFR 31.11. The tests will be performed only by personnel competent in the use of the instruments and in the handling of the byproduct materials.
C. I understand that Commission regulations require that any change in the information furnished by a registrant on this registration certificate be reported to the Office of Nuclear Material Safety and Safeguards within 30 days from the effective date of such change.
D. I have read and understand the provisions of Section 31.11 of NRC regulations 10 CFR 31 (reprinted on the reverse side of this form); and I understand that the registrant is required to comply with those provisions as to all byproduct material which he receives, acquires, possesses, uses, or transfers under the general license for which this Registration Certificate is filed with the U.S. Nuclear Regulatory Commission.

PRINTED OR TYPED NAME AND TITLE OF APPLICANT	SIGNATURE OF APPLICANT	DATE
Barry Dickman, Exec. Asst.	Barry Dickman	11/3/93

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECTS. 18 U.S.C. SECTION 1001 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.

CONDITIONS AND LIMITATIONS OF GENERAL LICENSE 10 CFR 31.11

§ 31.11 General license for use of byproduct materials for certain in vitro clinical or laboratory testing.

(a) A general license is hereby issued to any physician, veterinarian in the practice of veterinary medicine, clinical laboratory or hospital to receive, acquire, possess, transfer, or use, for any of the following stated tests, in accordance with the provisions of paragraphs (b), (c), (d), (e), and (f) of this section, the following byproduct materials in prepackaged units:

(1) Iodine-125, in units not exceeding 10 microcuries each for use in in vitro clinical or laboratory tests not involving internal or external administration of byproduct material, or the radiation therefrom, to human beings or animals.

(2) Iodine-131, in units not exceeding 10 microcuries each for use in in vitro clinical or laboratory tests not involving internal or external administration of byproduct material, or the radiation therefrom, to human beings or animals.

(3) Carbon-14, in units not exceeding 10 microcuries each for use in in vitro clinical or laboratory tests not involving internal or external administration of byproduct material, or the radiation therefrom, to human beings or animals.

(4) Hydrogen 3 (tritium), in units not exceeding 50 microcuries each for use in in vitro clinical or laboratory tests not involving internal or external administration of byproduct material, or the radiation therefrom, to human beings or animals.

(5) Iron 59, in units not exceeding 20 microcuries each for use in in vitro clinical or laboratory tests not involving internal or external administration of byproduct material, or the radiation therefrom, to human beings or animals.

(6) Selenium-75, in units not exceeding 10 microcuries each for use in in vitro clinical or laboratory tests not involving internal or external administration of byproduct material, or the radiation therefrom, to human beings or animals.

(7) Mock Iodine-125 reference or calibration sources, in units not exceeding 0.05 microcurie of iodine-129 and 0.005 microcurie of americium-241 each for use in in vitro clinical or laboratory tests not involving internal or external administration of byproduct material, or the radiation therefrom, to human beings or animals.

(b) A person shall not receive, acquire, possess, use or transfer byproduct material under the general license established by paragraph (a) of this section unless that person:

(1) Has filed NRC Form 483, "Registration Certificate—In Vitro Testing with Byproduct Material Under General License," with the Director of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, and received from the Commission a validated copy of NRC Form 483 with registration number assigned; or

(2) Has a license that authorizes the medical use of byproduct material that was issued under Part 35 of this chapter.

(c) A person who receives, acquires, possesses or uses byproduct material pursuant to the general license established by paragraph (a) of this section shall comply with the following:

(1) The general licensee shall not possess at any one time, pursuant to the general license in paragraph (a) of this section, at any one location of storage or use, a total amount of iodine 125, iodine 131, selenium-75, and/or iron 59 in excess of 200 microcuries.

(2) The general licensee shall store the byproduct material, until used, in the original shipping container or in a container providing equivalent radiation protection.

(3) The general licensee shall use the byproduct material only for the uses authorized by paragraph (a) of this section.

(4) The general licensee shall not transfer the byproduct material except by transfer to a person authorized to receive it by a license pursuant to this chapter or from an Agreement State,[1] nor transfer the byproduct material in any manner other than in the unopened, labeled shipping container as received from the supplier.

(5) The general licensee shall dispose of the Mock Iodine-125 reference or calibration sources described in paragraph (a)(7) of this section as required by § 20.301 of this chapter.

(d) The general licensee shall not receive, acquire, possess, or use byproduct material pursuant to paragraph (a) of this section:

(1) Except as prepackaged units which are labeled in accordance with the provisions of a specific license issued under the provisions of § 32.71 of this chapter or in accordance with the provisions of a specific license issued by an Agreement State that authorizes manufacture and distribution of iodine-125, iodine-131, carbon-14, hydrogen-3 (tritium), selenium-75, iron-59 or Mock Iodine-125 for distribution to persons generally licensed by the Agreement State.

(2) Unless the following statement, or a substantially similar statement which contains the information called for in the following statement, appears on a label affixed to each prepackaged unit or appears in a leaflet or brochure which accompanies the package:[2]

This radioactive material may be received, acquired, possessed, and used only by physicians, veterinarians in the practice of veterinary medicine, clinical laboratories or hospitals and only for in vitro clinical or laboratory tests not involving internal or external administration of the material or the radiation therefrom, to human beings or animals. Its receipt, acquisition, possession, use, and transfer are subject to the regulations and a general license of the U.S. Nuclear Regulatory Commission or of a State with which the Commission has entered into an agreement for the exercise of regulatory authority.

Name of manufacturer

(e) The registrant possessing or using byproduct materials under the general license of paragraph (a) of this section shall report in writing to the Director of Nuclear Material Safety and Safeguards any changes in the information furnished by him in the "Registration Certificate—In Vitro Testing with Byproduct Material Under General License," NRC Form 483. The report shall be furnished within 30 days after the effective date of such change.[3]

(f) Any person using byproduct material pursuant to the general license of paragraph (a) of this section is exempt from the requirements of Parts 19, 20 and 21 of this chapter with respect to byproduct materials covered by that general license, except that such persons using the Mock Iodine-125 described in paragraph (a)(7) of this section shall comply with the provisions of § 20.301, 20.402 and 20.403 of this chapter.

NOTES

[1] A State to which certain regulatory authority over radioactive material has been transferred by formal agreement, pursuant to section 274 of the Atomic Energy Act of 1954, as amended.

[2] Material generally licensed under this section prior to January 19, 1975 may bear labels authorized by the regulations in effect on January 1, 1975.

[3] A new triplicate set of this Registration Certificate, NRC Form 483, may be used to report any change of information furnished by a registrant as required by § 31.11(e).

If larger quantities or other forms of byproduct material than those specified in the general license of 10 CFR 31.11 are required, an "Application for Byproduct Material License," NRC Form 313 should be filed to obtain a specific byproduct material license. Copies of application and registration forms may be obtained from the Medical, Academic and Commercial Use Safety Branch (6H3), Division of Industrial and Medical Nuclear Safety, United States Nuclear Regulatory Commission, Washington, DC 20555.