



ST. CATHERINE'S
HOSPITAL

3556 Seventh Avenue
Kenosha, Wisconsin 53140-2595
Telephone (414) 656-3011

Caring for Generations

November 14, 1990

A. Bert Davis
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Davis:

In response to your letter dated November 2, 1990 concerning the NRC's Demand for Information, we submit the following rationale as our response to the perceived noncompliance by your Department. Our approach and conclusions are based on the following:

Our license (48-01670-02) was issued prior to July 27, 1990 and states that we are allowed to possess 6,500 Curies per source of Cobalt-60 in a sealed source for medical use. We have one source that was measured at less than 4,000 Curies in 1989.

On December 28, 1989, our license was amended (No. 18) to contain the following condition (No. 16):

"The licensee is exempt from decommissioning financial assurance requirements for possession of licensed material in sealed sources in quantities greater than the limits of 10 CFR 30.35(d) for the purpose of source changes only. This exemption is granted for no more than 30 days for any one source change."

We have interpreted this as a recognition that we do not ordinarily possess more than one sealed source and, by license, that source cannot exceed 6,500 Curies. Since the limits for a sealed source of Cobalt-60 in 10 CFR 30.35(d) is 10,000 Curies, we believe we are under the required amount.

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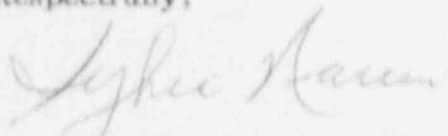
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This matter was discussed per phone with Lauren Hueter, of your office, on November 8, 1990. He advised that this letter be submitted as a course of action and that it should fulfill the Demand for Information. If there are any further actions required on the part of the Hospital, please contact me at (414) 656-3349.

Respectfully,



Sylvia Navin, Vice President
Patient Support Services

SN/ck
Attachment