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June 2, 1994

Mr. Jim Montgomery United States Nuclear Regulatory Commission Walnut Creek Field Office 1450 Maria Lane Walnut Creek, CA 94596

RE: Exemption to purchase Previously Owned Strontium-90 Medical Units

Dear Mr. Montgomery:

A special situation exists here in Hawaii, in that our offices are located on multiple islands. We to avoid the problem of repeatedly transporting one of the two Strontium-90 Medical Units we currently own.

At our last on site inspection, we learned there are 7 previously owned units which physicians have decided to discontinue using as a result of the burdensome regulations and high fees. Having no way to dispose of the nuclear material, they have given them up to, Mr. Scott Dube, our Local Nuclear Regulatory Safety Officer at the Queen's Medical Center.

We are interested in purchasing 2 previously owned Strontium-90 Medical Device Units, currently not in use.

request an exemption from the mandate purchase only new Strontium-90 Units from manufacturer or distributor, since:

The cost of the new units is prohibitive.

It is beneficial to use a previouslymanufactured radioactive source, rather than purchase a new one and add to the eventual problem of radioactive waste elimination.

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Accreditation Association for Ambulatory Health Care Inc.

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We realize Queen's Medical Center is not a manufacturer or distributor.

We also request that the unit be calibrated by our Local Certified Medical Physicist. This avoids the transportation of the Unit outside Hawaii and back again.

We appreciate your assistance in this common sense approach to our unique situation.

Aloha,

John M. Corboy, M.D.

XC: Mr. Scott Dube, Radiation Safety

JMC/ds