

University of Cincinnati  
Medical Center



University Hospital  
234 Goodman Street  
Cincinnati, Ohio 45267-0577

Eugene L. Saenger Radioisotope Laboratory  
Mail Location #577  
TELEPHONE (513) 872-4282

January 10, 1985

W. L. Axelson, Chief  
Nuclear Materials, Safety  
and Safeguards Branch  
Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Axelson:

In response to your letter of December 18, 1984 concerning the Severity which includes a Notice of Violation for the University of Cincinnati, License #34-6903-05, we are submitting the required written statement for each item of non-compliance.

1. The sealed source was opened by a radiation safety technologist under conditions of poor visibility. This accident could have happened at any installation in the country where the seeds would have been placed in plastic tubing which becomes discolored from use and an attempt made to retrieve the seeds and reutilize them because of their cost. These concerns have been shared with the manufacturer of the seeds who has agreed that it would be unwise for any of the high activity iodine-125 (40 mCi) seeds to be reutilized within a hospital since this problem could occur again anywhere.

In addition, the Radiation Safety Committee has suspended use of high activity iodine-125 seeds for brachytherapy until certain health physics aspects of these seeds are further clarified. Furthermore a new brachytherapy storage room has been constructed to provide greater isolation between the iodine-125 source and preparation area and the storage and preparation of other sources. A fume hood has also been installed in the new iodine-125 room to provide greater safety for workers in preparing brachytherapy iodine-125 sources. Formal instruction will continue to be provided to all radiation therapy technologists on the handling of iodine-125 seeds of any activity, including practice sessions loading dummy iodine-125 seeds.

2. 10 CFR 20.201(b) requires each licensee to make such surveys as may be necessary and reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. As corrective action a new brachytherapy room has been designed, built, and now occupied, which includes a special area and hood for iodine-125 and provides a low level

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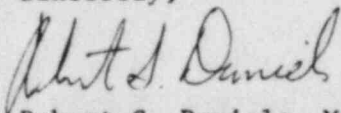
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background. In addition, the instrument for surveying this room is appropriate for detecting low levels of iodine-125 contamination in the new iodine-125 brachytherapy source preparation room.

Full compliance with license condition 15 and 10 CFR 20.201(b) is now in effect.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert S. Daniels".

Robert S. Daniels, M.D.  
Senior Vice President, Medical Center  
Dean, College of Medicine

RSD:snm  
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