ST. LOUIS, MISSOURI 63108 (314) 367-9300

April 10, 1981

Mr. Joseph Del Medico Material Licensing Branch Division of Fuel Cycle and Material Safety U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear lir. Del Ladico;

One of our hospitals have requested that we provide them with one of our week old 99-lolybdenum generators to be used as emergency back-up.

We request an amendment to our license No. 24-19360-011D for authorization to deliver 99-lolybdenum-99m-Technetium generators.

The surface of the generator will be wiped tested prior to shipment and the values recorded. Action levels for contamination will be in accordance with IRC Guide 3.23. The generator will be shipped in its original shipping container with the appropriate shielding.

All personnel will undergo training with respect to the specific hazards involved in transporting 99-Molybdenum genertors, and appropriate sections of the D.O.T. regulations governing the following:

1. Placarding Vehicles

2. The significance of transportation index

3. Security with respect to a vehicle carrying radioactive material

4. Distance with respect to radiation level and carrier personnel

5. Use of a cart to transport a generator to and from the delivery vehicle

Sincerely,

Manager

William C. Hellugh Ph.D.

Enclosed is a copy of training subject matter and procedures. In addition a cassette tape on radiation training and delivery instructions is played for all personnel.

If you have further question please do not hesitate to call.

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PHARMACO NUCLEAR, INC.

Instruction for Delivery Personnel

A. Non-Injury Accident

- 1. No radioactivity in car:
 - a. Notify the pharmacy as soon as possible where you are and an estimate of the length of time you will be tied up. Telephone 367-9300
- 2. Radioactivity in car:
 - a. Notify the pharmacy where you are as soon as possible. If necessary, have the patrolman notify the pharmacy where you are. Tell the police officer you are delivering emergency medicine and that it is radio-active. When you call or contact the pharmacy, tell us whether you are delivering material or returning to the lab and whether the material you are delivering has been damage. This will give us the opportunity to send out another driver to deliver the drugs if necessary.

B. Injury Accident:

If you are injured and can still communicate, ask the
officer to read the instructions located in the packet
on the dash. If possible, tell the officer whether you
have radioactive drugs in the car.

IN CASE OF AN ACCIDENT PROCEED AS FOLLOWS:

 Call Pharmaco Nuclear, Inc. immediately. Telephone Number: 367-9300

Pharmaco Nuclear, Inc., will immediately send trained personnel and the appropriate radiation detection equipment to ascertain:

- 1. Whether the vehicle contains radioactive materials.
- If the vehicle contains radioactivity, whether there
 has been contamination or whether the materials are
 still in tact and represent no hazard.
- 2. Isolate the area of the accident from the public, and remain at least 10 feet from the vehicle until Pharmaco Nuclear personnel arrive to certify the vehicle is safe for removal or use.

/Frank M. Comer/ Health Physicist Pharmaco Nuclear

Pharmaco nuclear inc.

- 11. Our business is based on good service so we require that employees be on time for work consistently. If you are going to be late for any reason or if you can't come in at all, please notify us as soon as pessible. preferably the night before. You may ALWAYS reach a pharmacist at ANY TIME by dialing 367-9300 as we have a 24-hour answering service. More than three times of significant tardiness can be cause for termination.
- 12. Pay day is the Thursday following the end of the pay period. This includes payments for mileage. NO exceptions.
- 13. TIME CARD POLICY:
 Punch in upon arrival each day when ready to work
 Punch out at end of each day or when instructed to do so by
 the pharmacist
 Don't even THINK of punching someone else's card even as a
 favor
 Always consult the pharmacist abount any time card problems
 No punch--No pay

B. Responsibilities of Delivery Personnel

- 1. Delivery of doses to area hospitals and clinics:
 - a. Always be courteous and cheerful to the people in the various nuclear medicine departments. You are the company's representative that they see every day and their impression of this company is influenced by the way they feel about you.
 - b. Dress in a civilized fashioh-better than taxi drivers but worse than a bank president is the general rule for acceptable appearance. If you look as good as the pharmacists, you are acceptable
 - c. NO SMOKING while on duty except in waiting area. This means no smoking in company cars and no smoking inside hospitals while making deliveries. Confirmed reports of violations of this rule is cause for termination. Same rule applies for eating and drinking.
 - d. Because of the necessity of providing quick service to our hospitals, lunch break will be unscheduled and irregular. There will sometimes be problems getting a break at a desired time. If you work less than eight(8) hours during a shift, your lunch break time will be paid as long as you remain in or near the pharmacy waiting area. Otherwise, obtain permission to punch out from the pharmacist personally for your lunch break. If you work eight or more hours during a shift, the company guarantees you a one-half(1) hour lunch break without pay and without interruption. Obtain permission te punch out from the pharmacist personally and don't forget te punch back in.

- e. Always carry cases in trunk or rear area of delivery vehicle.
- f. Do not leave the pharmacy with doses until specifically instructed to do so.
- g. Do not change itinerary or route without permission from the pharmacist in charge.
- h. Do not pick up riders while on delivery runs.
- 1. Never break the speed limit or any other traffic laws regardless of the urgency of the delivery.
- j. Always pick up boxes and empty dose containers whenever possible. LEAVE any dose containers that still have prescriptions attached to them with that day's date on it. If there is any question as to whether you should pick up a dose with a prescription attached, ask one of the technicians. If there is no one to ask, LEAVE the dose.
- k. Upon returning empty dose containers to the parmacy, monitor them with the hand monitor and if they are empty and not "hot", return them to the benches for re-use. If they contain a syringe or other dose, set them aside. If they are dirty, clean them as instructed.
- 1. If for any reason you are unavoidably delayed while on a run and are not able to deliver the materials at the required time, please call the pharmacy at 367-9300 as soon as possible so that another dose may be dispatched with another driver if necessary.

2. Care of delivery vehicles

- a. Care of the cars is the drivers' responsibility. If a car needs maintenance work, the person driving the car should notify the pharmacist so arrangements can be made to have the work done. Each car has a notebook in the glovebox in which all maintenance and repairs should be entered. These cars are leased for periods of two and three years and we are stuck with them for that long. If you take care of them, they will last very well. If you treat them like junk, you will have junk to drive for two years or more.
- b. It is the responsibility of each driver to keep the cars clean. Remove all trash each time you leave a car and vacuum them out occasionally. Also, clean the insides of the windows occasionally, as they collect a fine film which can be a visibility hazard when the windows feg up.
- c. Fill cars from the mini-service or self-serve pumps and check oil level and tire pressures periodically, and refill as needed. Try to keep the cars more than to full of fuel.