MS-16
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DEPARTMENT OF THE ARMY
U.S. ARMY MEDICAL DEPARTMENT ACTIVITY
FORT DIX, NEW JERSEY 08640-6600

REPLY TO
ATTENTION OF

HSXG-PM

15 January 1988

SUBJECT: Response Letter, Application for Renewal of NRC License, No. 29-07513-01, Walson Army Community Hospital, Fort Dix, NJ 08640

TO: U. S. Nuclear Regulatory Commission
Region I, Material Licensing
631 Park Avenue
King of Prussia, Pennsylvania 19406

As requested, additional information is provided to assist you in your review of WACH renewal license application.

a. (Question #1) Item 7.b. procedure (6), line 4, page 11 read "IAW 19.2 of CFR 19." We believe this is a typographical error and should read IAW 19.12 of 10 CFR 19. Please confirm.

RESPONSE: Item 1 should read IAW 19.12 of 10 CFR 19.

b. (Question #2) Please confirm that physicians approved by the Radiation Safety Committee for used outlined in 35.100, 35.200 and 35.300 will meet the training and experience criteria for those sections as outlined in Subpart J., 10 CFR 35 effective April 1, 1987.

RESPONSE: All physicians approved by the Radiation Safety Committee for uses outlined in 35.100, 35.200 and 35.300 will meet the training and experience criteria for those sections as outlined in Subpart J., 10 CFR 35 effective on April 1, 1987.

c. (Question #3) Please submit a copy of Dr. Arthur J. Greene's certification by the American Board of Radiology (ABR). We are unable to find his name listed as a successful candidate on the ABR's June 1986 computer listing.

RESPONSE: A copy of Dr. Arthur J. Greene's certification by the American Board of Radiology is attached as exhibit A.

d. (Question #4) Please clarify your submittal of procedures in Appendix E, pages 35 - 37 of your application. This Appendix only applies to imaging equipment that is transported from site by truck not within an institution.

RESPONSE: Appendix E was accidentally included in the license application. Procedures in Appendix C (Model Procedure for Calibrating Dose Calibrator) will be utilized.

e. (Question #5) Please confirm that a fume hood will be available for this storage multi dose volatiles and gases in accordance with 10 CFR 35.90.

RESPONSE: A fume hood will be installed prior to the storage of multi dose volatiles and gases. In the past, only unit dose has been used. Iodine 131 capsules use for minor therapy will be conducted under the hood located in the Injection Room. The use of liquid Iodine has been restricted, only Iodine 131 capsules will be permitted.

f. (Question #6) Item 14. of the application dated July 27, 1987 describes your procedures for the handling of incoming radionuclide shipments. Appendix L of the enclosed guide provides a safe opening procedure which is acceptable to the NRC. Please submit a copy of your revised procedures in the response to this letter.

RESPONSE: Appendix L (Handling of Incoming Radionuclide Shipments) from the Regulatory Guide 10.8 will be substituted for Item 14 of our application dated July 27, 1987.

g. (Question #7) 10 CFR 35.51 requires, that at the time of survey meter calibration, the apparent exposure rate from a built-in or owner-supplied check source be determined and recorded and that each survey instrument be checked with the dedicated check source each day of use. Please confirm that your procedures will include these requirements.

RESPONSE: Equipment utilized under this license will follow procedures found in 10 CFR 35.51.

h. (Question #8) Item 15, of the application dated July 23, 1987 indicated you will follow Appendix G procedure of Regulatory Guide 10.8, Rev. 1 October 1980. This Appendix does not contain procedures for compliance with 10 CFR 35.53, 35.60 and 35.61. Appendix I of the enclosed guide provides procedures acceptable to the NRC to comply with these procedures. Please submit a copy of your revised procedures in the response to this letter.

RESPONSE: Appendix I (Model Rules for Safe Use of Radiopharmaceuticals) will be used in lieu of Item 15, of the application dated July 23, 1987.

I. (Question #9) Item 17, of your application dated 23, 1987, you indicated that Appendix I Procedures will be followed for area surveys. These procedures require a method for wipe tests that is sensitive to detect 200 dpm per 100 cm^2 for the involved contaminant and also sets a removable contamination trigger level at 200 dpm/100 cm^2. Please describe the instrument you will use for these determinations.

RESPONSE: Appendix N (Model Procedure for Area Surveys) from Regulatory Guide 10.8, Rev. 1 August 1987, will be utilized. Table N-1 will be used to set action levels.

Radiation Survey Meters:

Manufacturer's Name: Victoreen, Model Number 498, Number of Instrument available: 4, Minimum range 0 - 1 mR/hr, Maximum range 0 - 1 R/h. Remarks: Units are equipped with thin window GM tubes and built-in check sources.

Radiation Survey Meter and Area Monitor Equipment:

Manufacturer's Name: Victoreen, Inc., Model Number 425, Radiation Survey Meter, GM tube, thin window GM Tube, Number of instruments available: 2, Minimum range: 0-500 CPM, Maximum range: 0-500,000 CPM used with loudspeaker and operational check source.

Removable Contamination Survey Equipment:

Ludlum (Scaler) Model 2000 (Scaler/rate meter)Model 2200, Minimum 0-500 CPM and a Maximum 0-500,000 CPM. Detectors are housed in a lead chamber and a sample holder is utilized. Several detectors are used, depending on which radioisotope(s)are used (Ludlum Model 44-1, Beta scintillator; Ludlum Model 44-3, Gamma scintillator; and Ludlum 44-7, Mica end window GM detector). Efficiency of the detector is determined using a certified sealed source with the same radioisotope as the source being tested.

J. (Question #10) 10 CFR 35.70 requires that a licensee be able to detect contamination on each wipe sample of 2000 disintegrations per minute for Tc-99m and 35.315(a)(7) requires a contamination trigger level of 200 disintegrations per minute for I-131. Submit revised procedures if you wish to change your removable contamination trigger levels to the regulatory requirements and also describe the instrument you will use for these determinations.

RESPONSE: Refer to (h) Removable Contamination Survey Equipment, above.

k. (Question #11) With regard to your procedures and precautions for radiopharmaceuticals therapy, 10 CFR 35.315 requires that each patient receiving radiopharmaceuticals therapy and hospitalized for compliance with 35.75 that: .....(a) to (d).

Please confirm that the use of radiopharmaceuticals for therapy will be in accordance with the safety precautions described in 10 CFR 35.315.

RESPONSE: Use of radiopharmaceutical for therapy will be in accordance with the safety precautions described in 10 CFR 35.315.

l. (Question #12), Please confirm that all personnel caring for patients receiving radiopharmaceutical therapy and hospitalized for compliance with 35.75 will be instructed in accordance with 35.310.

RESPONSE: All personnel caring for patients receiving radiopharmaceutical therapy and hospitalized for compliance with 35.75 will be instructed in accordance with 35.310.

m. (Question #13) Item 18 of your application indicates Appendix J form for waste disposal is attached. However, this attachment was missing form your submittal. Please submit this information. You may wish to refer to Appendix R of the enclosed guide.

RESPONSE: Appendix R (Model Procedure for Waste Disposal) will be utilized.

n. (Question #14) Please provide a copy of the Radiation Safety Officer delegation of authority as required by 10 CFR 35.23(b). You may wish to use the "Model Radiation Safety Officer Delegation of Authority" on page F-3 of the enclosed guide.

RESPONSE: As requested, a copy of the Radiation Safety Delegation of Authority is attached as Exhibit B. This form is currently being staffed through the Radiation Safety Committee and will be signed by the hospital commander by February 5, 1988

o. (Question #15) Please confirm that you will establish a visitor's safe line in accordance with 35.315 to demonstrate where a visitor may stay in a patient's room.

RESPONSE: A visitor's safe line will be established in accordance with 35.315 to demonstrate where a visitor may stay in a patient's room.

FOR THE COMMANDER:

Samuel James Murff

SAMUEL JAMES MURFF
CPT, MS
C, Radiation Protection Section

The American Board of Radiology

Organized through the cooperation of the
American College of Radiology, the American Roentgen Ray Society,
the American Radium Society, the Radiological Society of North America,
the Section on Radiology of the American Medical Association,
the American Society for Therapeutic Radiology and Oncology,
and the Association of University Radiologists
Hereby certifies that

Arthur Jerome Greene, M.D.

Has pursued an accepted course of graduate study
and clinical work, has met certain standards and qualifications and
has passed the examinations conducted under the authority of
The American Board of Radiology
On this eleventh day of June, 198[illegible]
Thereby demonstrating to the satisfaction of the Board
that he is qualified to practice the specialty of

Diagnostic Radiology

THE AMERICAN BOARD OF RADIOLOGY
INCORPORATED IN THE DISTRICT OF COLUMBIA
1934

M. Paul Capp, M.D.
President

Secretary

AMERICAN BOARD
OF
MEDICAL SPECIALTIES
EXCELLENCE
1933
OPTIMUSQUE

Exhibit A

DISPOSITION FORM

Exhibit P

FOR USE OF THIS FORM, SEE AR 340-15; TAGO

REFERENCE OR OFFICE SYMBOL	SUBJECT
HSXG-PM-RPO	Delegation of Authority

TO ALL EMPLOYEES FROM C, RAD PROTECTION DATE 17 JAN 1988 CMT 1

1. IAW Nuclear Regulatory Commission Regulations, CPT Samuel J. Murff has been responsible for ensuring the safe use of radiation. The Radiation Protection Officer is responsible for managing the radiation safety program; identifying radiation problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; and ensuring compliance with regulations. The Radiation Protection Officer is hereby delegated the authority necessary to meet those responsibilities.

2. The Radiation Protection Officer is also responsible for assisting the Radiation Safety Committee in the performance of its duties and serving as its recorder/secretary.

ALBERT C. MOLNAR
Colonel, MC
Commanding