

MS-16  
P-7Veterans  
Administration

JAN 20 1988

In Reply Refer To: 523/114

U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Reference License # 20-00671-02  
Docket # 030-01815  
Control # 107863

SUBJ: Information Requested for Continued Renewal Review of  
Byproduct Materials License

1. Following is our response to your letter of 12/16/87  
relative to the renewal application for the above referenced  
license:

a. Attached are the revised charter for the Radiation  
Safety Committee and revised duties of the Radiation Safety  
Officer. Both documents have been revised to reflect the  
contents of Regulatory Guide 10.8, Revision 2, which was not  
available when they were originally drafted. Further, the  
delegation of authority statement on page F-3 of that  
regulatory guide will be used as a model for an announcement  
of the delegation of RSO authority at this institution upon  
issuance of this license.

b. We hereby confirm that all area survey wipe tests will  
be expressed in disintegrations per minute as required in  
10 CFR 35.70(h). The record exception that allowed for an  
abbreviated entry when no abnormal exposure rates are  
observed has been deleted since it conflicts with  
10 CFR 35.70(h). This has been in effect since April,  
1987.

c. We hereby confirm that all areas where  
radiopharmaceuticals are routinely prepared and  
administered must be surveyed by the end of each working  
day. This has been in effect since April, 1987.

d. The action level adopted for area dose survey results  
is 2.5 mR/hour for restricted areas and 0.5 mR/hour for  
unrestricted areas.

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- e. (1) Nurses are briefed on radiation safety precautions prior to each therapy administration. The nursing instructions in the application are followed in each briefing, and a copy is left at the nursing station as a guide during treatment. Nurses are encouraged to raise questions as they arise and contact the RSO if questions occur after completion of the briefing.
- (2) The exposure rate standard is used as the release criterion and measurements are made as described in your letter.
- (3) The procedure for release of a patient's room for general occupancy following a radiation therapy procedure fulfills all the requirements as outlined in your letter.
- f. All materials, including linens, supplies, eating utensils, and clothing from brachytherapy patient rooms are held for survey and completion of source inventory prior to release.
- g. Brachytherapy sources are transported in a shielded container with built-in wheels. Sources are moved between floors via a freight elevator with Radiation Therapy personnel in attendance and only the elevator operator present.
- h. A sealed source survey and inventory log has been conducted and maintained since November, 1986, in accordance with 10 CFR 35.59 (g).

2. We trust the above responses to your specific questions will provide the necessary additional information to complete the review of our renewal application. We appreciate the thorough review of our program.

*Krista Ludenia, Ph.D.*

KRISTA LUDENIA, Ph.D.  
Acting Medical Center Director

Enclosures

## DUTIES OF RADIATION SAFETY OFFICER

The appointed Radiation Safety Officer, who is responsible for ensuring the safe use of radiation, shall assume the following duties:

1. Control of the purchase of all radionuclides.
2. Coordinate all uses of radionuclides.
3. Control radioactive materials such that they are used only by properly trained and authorized individuals.
4. Coordinate personnel monitoring as necessary for those persons likely to receive more than 10% of maximum permissible exposures.
5. Provide initial training and annual retraining of all individuals working with radionuclides. Such training shall include:
  - A. Review of license and conditions.
  - B. Review of 10 CFR Parts 19 and 20.
  - C. Review of basics of radiation protection, radiation effects, and radiation measurements and calculations.
  - D. Required laboratory practices and procedures.
6. Provide initial orientation and annual reorientation for all ancillary personnel whose duties may require them to work in the vicinity of radioactive materials (e.g., janitors, guards). Such instruction will include an explanation of the potential radiation hazard, information on ways of controlling or avoiding unnecessary exposure, and actions to be taken in the event of emergency.
7. Establish and conduct a radiation safety program which shall include:
  - A. Routine surveys of all areas where radiation sources are used.
  - B. Inventory control procedures to guarantee adequate control of such materials.
  - C. Routine review of all radionuclides uses, including routine review of laboratory survey and use records.
  - D. Bioassay programs as necessary.
  - E. Air sampling programs as necessary.
  - F. Establishment and maintenance of an appropriate emergency program.
8. Identifying radiation safety problem and initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; and ensuring compliance with regulations.
9. Designate an alternate Radiation Safety Officer during times of absence.
10. The Radiation Safety Officer is also responsible for assisting the Radiation Safety Committee in the performance of its duties and serving as its secretary.

8. Recommend remedial action to correct any deficiencies identified in the radiation safety program;
9. Maintain written minutes of all Committee meetings, including members in attendance and members absent, discussions, actions, recommendations, decisions, and numerical results of all votes taken; and
10. Ensure that the byproduct material license is amended if required prior to any changes in facilities, equipment, policies, procedures, and personnel.

#### Administrative Information

1. The Committee shall meet as often as necessary to conduct its business but not less than once in each calendar quarter.
2. Membership must include one authorized user for each type of use authorized by the license, the RSO, a representative of the nursing service, and a representative of management who is neither an authorized user nor an RSO. Management may appoint alternate members to participate in meetings in the case of absence of principal members and may appoint as adjunct members representatives from security, physical plant, housekeeping, and other departments. (Adjunct members should abstain from balloting on radiation safety technical questions such as Items 2 through 5 in the "Responsibilities" section above.)
3. To establish a quorum, one-half of the Committee's membership, including the RSO and the management representative, must be present.
4. The names and qualification of the current committee members are on file at BVAMC. Changes in committee membership will be documented in the committee's records, and will be available for inspection by the NRC.
5. The committee contains two subcommittees, one covering human uses, the other covering in vitro and animal research uses. These subcommittees will meet as necessary to review applications in their respective areas subject to final ratification by the full committee at its quarterly meetings. Applications reviewed and approved by the appropriate subcommittee may be granted temporary approval to proceed pending full committee ratification.
6. The chairman of the committee will be appointed by the Medical Center Director.

## RADIATION SAFETY COMMITTEE CHARTER

### Charge. The Committee shall:

1. Ensure that all ongoing radiation sources within the institution will be used safely. This includes review as necessary of training programs, equipment, facility, supplies, and procedures;
2. Ensure that licensed material is used in compliance with NRC regulations and the institutional license;
3. Ensure that the use of licensed material is consistent with the ALARA philosophy and program;
4. Establish a table of investigational levels for individual occupational radiation exposures; and
5. Identify program problems and solutions.

### Responsibilities. The Committee shall:

1. Be familiar with all pertinent NRC regulations, the license application, the license, and amendments;
2. Review the training and experience of the proposed authorized users, the Radiation Safety Officer (RSO), and the teletherapy physicist to determine that their qualifications are sufficient to enable the individuals to perform their duties safely and are in accordance with the regulations and the license;
3. Review on the basis of safety and approve or deny, consistent with the limitations of the regulations, the license, and the ALARA philosophy, all requests for authorization to use radioactive material within the institution;
4. Prescribe special conditions that will be required during a proposed method of use of radioactive material such as requirements for bioassays, physical examinations of users, and special monitoring procedures;
5. Review quarterly the RSO's summary report of the occupational radiation exposure records of all personnel, giving attention to individuals or groups of workers whose occupational exposure appears excessive;
6. Establish a program to ensure that all persons whose duties may require them to work in or frequent areas where radioactive materials are used (e.g., nursing, security, housekeeping, physical plant) are appropriately instructed as required in subchapter 19.12 of 10 CFR Part 19;
7. Review at least annually the RSO's summary report of the entire radiation safety program to determine that all activities are being conducted safely, in accordance with NRC regulations and the conditions of the license, and consistent with the ALARA program and philosophy. The review must include an examination of records, reports from the RSO, results of NRC inspections, written safety procedures, and the adequacy of the management control system;