

252049

08 FEB 16 10:13

Veterans
Administration

In Reply Refer To:

January 19, 1988

U.S. Nuclear Regulatory Commission
Region II
Material Radiation Protection Section
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

Subject: Amendment to By-Product License No. 09-00239-06

Gentlemen:

1. We have developed a package opening procedure for your review that is appended as ATT 10.7 (attached), pursuant to Appendix L, Regulatory Guide 10.8, revision 2.
2. Request amendment to License No. 09-00239-06 to incorporate the revised procedures for safely opening packages containing radioactive material.

Sincerely,

T.C. DOHERTY
Director

1/26/88

JAMES W. FLETCHER, M.D.
Director, Nuclear Medicine Service (115)
Veterans Administration
Washington, DC 20420

FEE EXEMPT

8803110069 880119
REG2 LIC30
09-00239-06 DCD

Procedure for Safely Opening Packages Containing
Radioactive Material

1. Special requirements must be followed for packages containing quantities of radioactive material in excess of the Type A quantity limits specified in paragraph 20.205(b) of 10 CFR Part 20 (e.g., more than 20 curies of Mo-99, Tc-99m, uncompressed Xe-133, or more than 3 curies of Xe-133, I-131, Cs-137, Ir-192, I-125, or more than 0.001 curie of Ra-226). Such packages must be monitored for external radiation levels and surface contamination within 3 hours after receipt if received during working hours or within 18 hours if received after working hours, in accordance with the requirements of paragraphs 20.205(a) through (c). The NRC Regional Office must be notified if removable contamination exceeds 0.01 microcurie (22,000 dpm)/ 100 cm². We are not currently licensed to receive the quantities specified in this paragraph. Any shipments containing these quantities will be returned to vendor at vendor's expense. NRC will be notified if any irregularities occur.
2. For packages received under specific license, the following procedure for opening each package will be followed:

Upon receipt of the packages:

Radioactive shipments for clinical use will be received by Chief Technologist or his designee.

All other packages containing radioactive material will be received by the Radiation Safety Officer or his designee.

- a. Put on gloves to prevent hand contamination.
- b. Visually inspect the package for any sign of damage (wet or crushed). If damage is noted, call the RSO or his designee (they will check for any leaks or removable contamination.).
- c. Measure the exposure rate from the package at 1 meter and at the surface. If it is higher than expected, notify RSO or his designee who will check for proper labeling and removable contamination. (The dose rate from packages with white label I should be less than .5 mRem/hr. at the surface dose rate for packages with yellow II or yellow III should be less than 200 mRem/hr.).
- d. Remove the packing slip.
- e. Open the outer package following the suppliers instruction, if provided.
- f. Open the inner package and verify that the contents agree with the packing slip.
- g. Check the integrity of the final source container. Look for broken seals or vials, loss of liquid, condensation, or discoloration of the packing material.

- h. If contamination is suspected, notify RSO (wipe the external surface of the final source container. Assay the wipe with a thin end-window GM tube, well counter or scintillation counter.)
- i. Monitor the packing material and the empty packages for contamination with a radiation detection survey meter before discarding:
 - (1) If contaminated, treat this material as radioactive waste.
 - (2) If not contaminated, remove or obliterate the radiation labels before discarding as regular waste.
- j. Keep a record of surveys and wipe tests if performed on existing format (sample attached).
- k. Call the investigator for pick-up and sign on the sheet.
- l. Technicians receiving packages containing by-product material listed in 31.11 of 10CFR31 will visually inspect for any sign of damage (e.g. wet or crushed). If damage is noted will stop the procedure and notify the RSO.



**Veterans
Administration**

In Reply Refer To:

January 19, 1988

Director Nuclear Medicine Service (115)
Department of Medicine and Surgery
Veterans Administration Central Office
Washington, D.C. 20420

Subject: NRC By-Product Material License

1. Enclosed is an application for amendment to NRC by-product license.
2. Please retain a copy of the application for your files and forward one to the Nuclear Regulatory Commission.

Sincerely,

A handwritten signature in cursive script, appearing to read 'T.C. Doherty'.

T.C. DOHERTY
Director

A handwritten signature in cursive script, appearing to read 'James W. Fletcher, M.D.'. To the right of the signature is the date '1/26/88'.

JAMES W. FLETCHER, M.D.
Director, Nuclear Medicine Service (115)
Veterans Administration
Washington, DC 20420

Procedure for Safely Opening Packages Containing Radioactive Material

1. Special requirements must be followed for packages containing quantities of radioactive material in excess of the Type A quantity limits specified in paragraph 20.205(b) of 10 CFR Part 20 (e.g., more than 20 curies of Mo-99, Tc-99m, uncompressed Xe-133, or more than 3 curies of Xe-133, I-131, Cs-137, Ir-192, I-125, or more than 0.001 curie of Ra-226). Such packages must be monitored for external radiation levels and surface contamination within 3 hours after receipt if received during working hours or within 18 hours if received after working hours, in accordance with the requirements of paragraphs 20.205(a) through (c). The NRC Regional Office must be notified if removable contamination exceeds 0.01 microcurie (22,000 dpm)/ 100 cm². We are not currently licensed to receive the quantities specified in this paragraph. Any shipments containing these quantities will be returned to vendor at vendor's expense. NRC will be notified if any irregularities occur.
2. For packages received under specific license, the following procedure for opening each package will be followed:

Upon receipt of the packages:

Radioactive shipments for clinical use will be received by Chief Technologist or his designee.

All other packages containing radioactive material will be received by the Radiation Safety Officer or his designee.

- a. Put on gloves to prevent hand contamination.
- b. Visually inspect the package for any sign of damage (wet or crushed). If damage is noted, call the RSO or his designee (they will check for any leaks or removable contamination.).
- c. Measure the exposure rate from the package at 1 meter and at the surface. If it is higher than expected, notify RSO or his designee who will check for proper labeling and removable contamination. (The dose rate from packages with white label I should be less than .5 mRem/hr. at the surface dose rate for packages with yellow II or yellow III should be less than 200 mRem/hr.).
- d. Remove the packing slip.
- e. Open the outer package following the suppliers instruction, if provided.
- f. Open the inner package and verify that the contents agree with the packing slip.
- g. Check the integrity of the final source container. Look for broken seals or vials, loss of liquid, condensation, or discoloration of the packing material.

- h. If contamination is suspected, notify RSO (wipe the external surface of the final source container. Assay the wipe with a thin end-window GM tube, well counter or scintillation counter.)
- i. Monitor the packing material and the empty packages for contamination with a radiation detection survey meter before discarding:
 - (1) If contaminated, treat this material as radioactive waste.
 - (2) If not contaminated, remove or obliterate the radiation labels before discarding as regular waste.
- j. Keep a record of surveys and wipe tests if performed on existing format (sample attached).
- k. Call the investigator for pick-up and sign on the sheet.
- l. Technicians receiving packages containing by-product material listed in 31.11 of 10CFR31 will visually inspect for any sign of damage (e.g. wet or crushed). If damage is noted will stop the procedure and notify the RSO.