

**Veterans
Administration**

March 5, 1986

In Reply Refer To:

Dr. John E. Glenn, Chief
Nuclear Materials Safety Section B
Nuclear Regulatory Commission, Region 1
631 Park Avenue
King of Prussia, PA 19406

SUBJ: Amendment to Materials License #06-11222-01 regarding clarification of Procedures for Opening Packages Containing Radioactive Material.

Dear Dr. Glenn:

1. Pursuant to the regulation 10 CFR 20.205 (b) and (c) which allows for exemptions of certain quantities of license materials from monitoring upon receipt, a survey of radioisotope shipments in the last five years demonstrated that all materials received by us have been of exempt nature except NaI¹³¹ therapeutic solution above 100 millicuries in liquid form.

2. We would like to amend our license to allow us to utilize the exempt status of these shipments specified in 10 CFR 20.205 (b) and (c). The new opening procedures for exempt and non-exempt shipments will be as follow:

FOR ALL PACKAGES

- a. Visual inspection for any signs of damage (e.g. wetness, crushed). If damage is noted, stop procedure and notify Radiation Safety Officer.
- b. Measure exposure rate at 3 feet from package surface and at the package surface and record. If reading exceeds 10 mR/hr, or 200 mR/hr respectively, stop procedure and notify Radiation Safety Officer. If less than 10 mR/hr, record minimal.
- c. Wearing gloves open the outer package (following manufacturer's directions, if supplied) and remove packing slip. Open inner package to verify contents, compare requisition, packing slips and labels. Check that shipment does not exceed possession limits and log the amount in receipt log.
- d. Monitor the packing material and packages for contamination before discarding:
 - (1) If contaminated, treat as radioactive waste,
 - (2) If not, obliterate radiation labels before discarding in regular trash.

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2. .

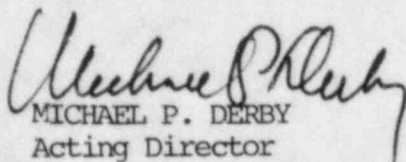
Dr. John E. Glenn

FOR NON-EXEMPT SHIPMENTS

- a. Visual inspection for any signs of damage (e.g. wetness, crushed). If damage is noted, stop procedure and notify Radiation Safety Officer.
- b. Measure exposure rate at 3 feet from package surface and at the package surface and record. If reading exceeds 10 mR/hr or 200 mR/hr respectively, stop procedure and notify Radiation Safety Officer. If less than 10 mR/hr, record minimal.
- c. Wearing gloves open the outer package (following manufacturer's directions, if supplied) and remove packing slip. Open inner package to verify contents, compare requisition, packing slips and labels. Check that shipment does not exceed possession limits and log the amount in receipt log.
- d. Wipe external surface of final shielded source container with moistened cotton swab or filter paper held with forceps, assay and record in the log book (see attachment).
- e. Monitor the packing material and packages for contamination before discarding:
 - (1) If contaminated, treat as radioactive waste,
 - (2) If not, obliterate radiation labels before discarding in regular trash.
- f. If removable contamination of any liquid shipment exceeds 0.01 uCi/100 cm² or if external radiation levels exceed 200 mR/hr at the package surface or 10 mR/hr at 3 feet, the NRC Regional Office will be notified.

3. Thank you for your consideration in this matter. We will appreciate hearing from you at your earliest convenience.

Sincerely,


MICHAEL P. DERBY
Acting Director

CC: Director of Nuclear Medicine, VACO



* if non-exempt status