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MAR 18 1986

Southwestern Michigan Health Care Center  
Mercy Hospital Division  
Radiology Department  
ATTN: Richard Muir  
Senior Vice President  
960 Agard Street  
Benton Harbor, MI 49022

Gentlemen:

We have reviewed your letter received February 10, 1986 requesting an amendment to your NRC License Number 21-04177-01 and find that we will need additional information in support of adding iodine-125 sealed sources for use in bone mineral analyzers, please submit responses to the following items:

1. Specify the title and training of the individuals who will be responsible for installing and removing the gadolinium-153 source from the device. Each individuals who will perform these operations should be trained by the manufacturer.
2. Submit specific procedures that will be followed when installing or removing the gadolinium-153 source from the device. You may submit copies of the manufacturer's recommended procedures.
3. State the method for disposing of **your sealed sources** that have decayed or that are no longer needed.
4. Specify who will perform the servicing and maintenance of the bone mineral analyzer involving the source holder and/or shutter mechanism. We recommend that such services be performed by the manufacturer or by other persons specifically authorized by the Nuclear Regulatory Commission or an Agreement State.
5. Submit a description of your facility indicating the location of where the bone mineral analyzer will be stored. Also, describe your procedures for assuring that the bone mineral analyzer and source are secured at all times against unauthorized use or removal.
6. Submit a copy of the step-by-step procedures you will follow for leak testing the sealed sources including collecting and analyzing the sample. (If you plan to use a leak test kit, please submit the name of the manufacturer and manufacturer's model numbers of the leak test kit.)

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7. Regarding your request for an exemption to 10 CFR Part 35.14(b)(3), to receive the iodine-125 sealed source from Borgess Medical Center, please submit the following information:
  - a. Justification for this request, i.e., the reason that the facilities involved cannot receive materials solely in accordance with 10 CFR 35.14(b)(3).
  - b. Concurrence from the administrator of each participating institution.
  - c. A general, but complete description of how a typical transfer will work (i.e., which institution will transfer material, how a typical transfer will be initiated, the title of the person responsible for initiating and implementing the transfer, a general description of the events that will follow once the materials are on site of the receiving institution, etc.).
  - d. Identification of the individuals who will transport the material, and the training they will receive. This training should, as a minimum, include all the items outlined in 10 CFR 19.12 and decontamination procedures in case of spills.
  - e. Safety measures to be used in transporting the radioactive materials in the applicants' vehicles (e.g., security against unauthorized removal, away from passenger compartment, lead shields, etc.).
  - f. Emergency procedures to be followed in case of accidents involving loss of radioactive materials.
  - g. If the bone densitometers are transported along with the sources, describe the quality assurance checks that will be performed after transport to verify proper operation of the devices prior to use.
8. Please confirm if your official mailing address is to remain as stated on your license, Southwestern Michigan Health Care Center, Mercy Hospital Division, Radiology Department, 960 Agard Street, Benton Harbor, Michigan 49011 or should it be changed to read Mercy Memorial Medical Center, Inc., 960 Agard, Benton Harbor, Michigan 49022 as stated on the letterhead of your amendment request.

If you have any questions or require clarification on any of the information stated above, you may contact us at (312) 790-5625.

Southwestern Michigan Health  
Care Center

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
We will continue our review of your application upon receipt of this information.  
Please reply in duplicate, within 30 days, and refer to Control Number 80708.

Sincerely,

Original Signed By  
Cassandra F. McDonald  
Materials Licensing Section

Enclosure: 10 CFR Part 35

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McDonald/cm  
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