

**INSTRUCTIONS** - Complete Items 1 through 26 if this is an initial application or an application for renewal of a license. Use supplemental sheets where necessary. Item 26 must be completed on all applications and signed. Retain one copy. Submit original and one copy of entire application to: Director, Office of Nuclear Materials Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. Upon approval of this application, the applicant will receive a Materials License. An NRC Materials License is issued in accordance with the general requirements contained in Title 10, Code of Federal Regulations, Part 30, and the Licensee is subject to Title 10, Code of Federal Regulations, Parts 19, 20 and 35 and the license fee provision of Title 10, Code of Federal Regulations, Part 170. The license fee category should be stated in Item 26 and the appropriate fee enclosed.

1.a. NAME AND MAILING ADDRESS OF APPLICANT (institution, firm, clinic, physician, etc.) INCLUDE ZIP CODE  
 Northeastern Ohio General Hospital  
 2041 Hubbard Road  
 Madison, Ohio 44057  
 TELEPHONE NO.: AREA CODE (216) 428 - 2121

1.b. STREET ADDRESS(ES) AT WHICH RADIOACTIVE MATERIAL WILL BE USED (If different from 1.a.) INCLUDE ZIP CODE  
 Same

2. PERSON TO CONTACT REGARDING THIS APPLICATION  
 Sam Pontillo, Consultant  
 Nuclear Medicine Associates  
 TELEPHONE NO.: AREA CODE (216) 641 - 5799

3. THIS IS AN APPLICATION FOR: (Check appropriate item)  
 a.  NEW LICENSE  
 b.  AMENDMENT TO LICENSE NO. 34-16763-01  
 c.  RENEWAL OF LICENSE NO. \_\_\_\_\_

4. INDIVIDUAL USERS (Name individuals who will use or directly supervise use of radioactive material. Complete Supplements A and B for each individual.)  
 Refer to Item #8

5. RADIATION SAFETY OFFICER (RSO) (Name of person designated as radiation safety officer. If other than individual user, complete resume of training and experience as in Supplement A.)  
 Donald J. Gordon, D.O. with consultation from Nuclear Medicine Associates, Cleveland, Ohio 44125

6.a. RADIOACTIVE MATERIAL FOR MEDICAL USE

| RADIOACTIVE MATERIAL LISTED IN:      | ITEMS DESIRED "X" | MAXIMUM POSSESSION LIMITS (In millicuries) | ADDITIONAL ITEMS:   | MARK ITEMS DESIRED "X" | MAXIMUM POSSESSION LIMITS (In millicuries) |
|--------------------------------------|-------------------|--|---|------------------------|--|
| 10 CFR 31.11 FOR IN VITRO STUDIES    |                   |  | IODINE-131 AS IODIDE FOR TREATMENT OF HYPERTHYROIDISM   |                        |  |
| 10 CFR 35.100, SCHEDULE A, GROUP I   | X                 | AS NEEDED                                  | PHOSPHORUS-32 AS SOLUBLE PHOSPHATE FOR TREATMENT OF POLYCYTHEMIA VERA, LEUKEMIA AND BONE METASTASES |                        |  |
| 10 CFR 35.100, SCHEDULE A, GROUP II  | X                 | AS NEEDED                                  | PHOSPHORUS-32 AS COLLOIDAL CHROMIC PHOSPHATE FOR INTRACAVITARY TREATMENT OF MALIGNANT EFFUSIONS.    |                        |  |
| 10 CFR 35.100, SCHEDULE A, GROUP III |                   |  | GOLD-198 AS COLLOID FOR INTRACAVITARY TREATMENT OF MALIGNANT EFFUSIONS.                             |                        |  |
| 10 CFR 35.100, SCHEDULE A, GROUP IV  |                   | AS NEEDED                                  | IODINE-131 AS IODIDE FOR TREATMENT OF THYROID CARCINOMA   |                        |  |
| 10 CFR 35.100, SCHEDULE A, GROUP V   |                   | AS NEEDED                                  | XENON-133 AS GAS OR GAS IN SALINE FOR BLOOD FLOW STUDIES AND PULMONARY FUNCTION STUDIES             |                        |  |
| 10 CFR 35.100, SCHEDULE A, GROUP VI  |                   |  |   |                        |  |

6.b. RADIOACTIVE MATERIAL FOR USES NOT LISTED IN ITEM 6.a. (Sealed sources up to 3 mCi used for calibration and reference standards are authorized under Section 35.14(d), 10 CFR Part 35, and NEED NOT BE LISTED.)

| ELEMENT AND MASS NUMBER   | CHEMICAL AND/OR PHYSICAL FORM | MAXIMUM NUMBER OF MILLICURIES OF EACH FORM | REMITTER DESCRIBE PURPOSE OF USE  |
|---|-------------------------------|--|---|
| The purpose of this amendment application is two-fold:<br>1. Amend the license in its entirety.<br>2. Delete Siemens Corp. well system, Model #4454A. |                               |  | Remitter Check No. 4222<br>Amount \$220<br>Fee Category <i>Amend</i><br>Type of Fee <i>Amend</i><br>Date Check Rec'd. 5/14/80<br>Date Completed 5/14/80<br>By: <i>[Signature]</i> |

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**INFORMATION REQUIRED FOR ITEMS 7 THROUGH 23**

For Items 7 through 23, check the appropriate box(es) and submit a detailed description of all the requested information. Begin each item on a separate sheet. Identify the item number and the date of the application in the lower right corner of each page. If you indicate that an appendix to the medical licensing guide will be followed, do not submit the pages, but specify the revision number and date of the referenced guide: Regulatory Guide 10.8 , Rev. \_\_\_\_\_ Date: \_\_\_\_\_

|  |   |   |  |
|--|---|---|--|
| <b>7. MEDICAL ISOTOPES COMMITTEE</b>   |   | <b>15. GENERAL RULES FOR THE SAFE USE OF RADIOACTIVE MATERIAL (Check One)</b>               |  |
| <input type="checkbox"/>   | Names and Specialties Attached; and   | <input checked="" type="checkbox"/>   | Appendix G Rules Followed; or                        |
| <input checked="" type="checkbox"/>  | Duties as in Appendix B; or _____ (Check One)                               | <input type="checkbox"/>  | Equivalent Rules Attached                            |
| <input type="checkbox"/>   | Equivalent Duties Attached  | <b>16. EMERGENCY PROCEDURES (Check One)</b>   |  |
| <b>8. TRAINING AND EXPERIENCE</b>  |   | <input checked="" type="checkbox"/>   | Appendix H Procedures Followed; or                   |
| <input type="checkbox"/>   | Supplements A & B Attached for Each Individual User; and                    | <input type="checkbox"/>  | Equivalent Procedures Attached                       |
| <input checked="" type="checkbox"/>  | Refer to attached Item #8   | <b>17. AREA SURVEY PROCEDURES (Check One)</b>   |  |
| <b>9. INSTRUMENTATION (Check One)</b>  |   | <input type="checkbox"/>  | Appendix I Procedures Followed; or                   |
| <input checked="" type="checkbox"/>  | Appendix C Form Attached; or  | <input checked="" type="checkbox"/>   | Equivalent Procedures Attached                       |
| <input type="checkbox"/>   | List by Name and Model Number   | <b>18. WASTE DISPOSAL (Check One)</b>   |  |
| <b>10. CALIBRATION OF INSTRUMENTS</b>  |   | <input checked="" type="checkbox"/>   | Appendix J Form Attached; or                         |
| <input type="checkbox"/>   | Appendix D Procedures Followed for Survey Instruments; or _____ (Check One) | <input type="checkbox"/>  | Equivalent Information Attached                      |
| <input checked="" type="checkbox"/>  | Equivalent Procedures Attached; and   | <b>19. THERAPEUTIC USE OF RADIOPHARMACEUTICALS (Check One)</b>                              |  |
| <input type="checkbox"/>   | Appendix D Procedures Followed for Dose Calibrator; or _____ (Check One)    | <input type="checkbox"/>  | Appendix K Procedures Followed; or                   |
| <input checked="" type="checkbox"/>  | Equivalent Procedures Attached  | <input type="checkbox"/>  | Equivalent Procedures Attached                       |
| <b>11. FACILITIES AND EQUIPMENT</b>  |   | <b>20. THERAPEUTIC USE OF SEALED SOURCES</b>  |  |
| <input checked="" type="checkbox"/>  | Description and Diagram Attached  | <input type="checkbox"/>  | Detailed Information Attached; and                   |
| <b>12. PERSONNEL TRAINING PROGRAM</b>  |   | <input type="checkbox"/>  | Appendix L Procedures Followed; or _____ (Check One) |
| <input checked="" type="checkbox"/>  | Description of Training Attached  | <input type="checkbox"/>  | Equivalent Procedures Attached                       |
| <b>13. PROCEDURES FOR ORDERING AND RECEIVING RADIOACTIVE MATERIAL</b>                          |   | <b>21. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE GASES (e.g., Xenon - 133)</b>      |  |
| <input checked="" type="checkbox"/>  | Detailed Information Attached   | <input type="checkbox"/>  | Detailed Information Attached                        |
| <b>14. PROCEDURES FOR SAFELY OPENING PACKAGES CONTAINING RADIOACTIVE MATERIALS (Check One)</b> |   | <b>22. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE MATERIAL IN ANIMALS</b>            |  |
| <input checked="" type="checkbox"/>  | Appendix F Procedures Followed; or  | <input type="checkbox"/>  | Detailed Information Attached                        |
| <input type="checkbox"/>   | Equivalent Procedures Attached  | <b>23. PROCEDURES AND PRECAUTIONS FOR USE OF RADIOACTIVE MATERIAL SPECIFIED IN ITEM 6.b</b> |  |
| <input type="checkbox"/>   |   | <input type="checkbox"/>  | Detailed Information Attached                        |

**24. PERSONNEL MONITORING DEVICES**

| TYPE<br><i>(Check appropriate box)</i> |   | SUPPLIER                  | EXCHANGE FREQUENCY |
|--|---|---------------------------|--------------------|
| a. WHOLE BODY                          | <input checked="" type="checkbox"/> FILM        | R.S. Landauer, Jr. & Sons | Monthly            |
|  | <input type="checkbox"/> TLD                    |                           |                    |
|  | <input type="checkbox"/> OTHER <i>(Specify)</i> |                           |                    |
| b. FINGER                              | <input type="checkbox"/> FILM                   |                           |                    |
|  | <input checked="" type="checkbox"/> TLD         | R.S. Landauer, Jr. & Sons | Monthly            |
|  | <input type="checkbox"/> OTHER <i>(Specify)</i> |                           |                    |
| c. WRIST                               | <input type="checkbox"/> FILM                   |                           |                    |
|  | <input type="checkbox"/> TLD                    |                           |                    |
|  | <input type="checkbox"/> OTHER <i>(Specify)</i> |                           |                    |

d. OTHER *(Specify)*

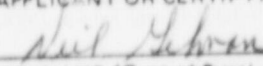
**25. FOR PRIVATE PRACTICE APPLICANTS ONLY**

|   |                  |  |  |
|---|------------------|--|--|
| a. HOSPITAL AGREEING TO ACCEPT PATIENTS CONTAINING RADIOACTIVE MATERIAL |                  | b. ATTACH A COPY OF THE AGREEMENT LETTER SIGNED BY THE HOSPITAL ADMINISTRATOR.   |  |
| NAME OF HOSPITAL  |                  | c. WHEN REQUESTING THERAPY PROCEDURES, ATTACH A COPY OF RADIATION SAFETY PRECAUTIONS TO BE TAKEN AND LIST AVAILABLE RADIATION DETECTION INSTRUMENTS. |  |
| MAILING ADDRESS   |                  |  |  |
| CITY  | STATE   ZIP CODE |  |  |

**26. CERTIFICATE**

*(This item must be completed by applicant)*

The applicant and any official executing this certificate on behalf of the applicant named in Item 1a certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, Parts 30 and 35, and that all information contained herein, including any supplements attached hereto, is true and correct to the best of our knowledge and belief.

|  |  |
|--|--|
| a. LICENSE FEE REQUIRED<br><i>(See Section 170.31, 10 CFR 170)</i> | b. APPLICANT OR CERTIFYING OFFICIAL <i>(Signature)</i>                                 |
|  | X  |
| (1) LICENSE FEE CATEGORY   | X (1) NAME <i>(Type of Print)</i>  |
| 7C   | X Neil Gilman  |
| (2) LICENSE FEE ENCLOSED \$ 120.00                                 | X (2) TITLE  |
|  | X Administrator  |
|  | c. DATE  |
|  | X April 22, 1986   |

## PRIVACY ACT STATEMENT

Pursuant to 5 U.S.C. 552a(e)(3), enacted into law by section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission on NRC Form 313M. This information is maintained in a system of records designated as NRC-3 and described at 40 Federal Register 45334 (October 1, 1975).

1. **AUTHORITY** Sections 81 and 161(b) of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2111 and 2201(b)).
2. **PRINCIPAL PURPOSE(S)** The information is evaluated by the NRC staff pursuant to the criteria set forth in 10 CFR Parts 30-36 to determine whether the application meets the requirements of the Atomic Energy Act of 1954, as amended, and the Commission's regulations, for the issuance of a radioactive material license or amendment thereof.
3. **ROUTINE USES** The information may be used: (a) to provide records to State health departments for their information and use; and (b) to provide information to Federal, State, and local health officials and other persons in the event of incident or exposure, for their information, investigation, and protection of the public health and safety. The information may also be disclosed to appropriate Federal, State, and local agencies in the event that the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, or local agency to the extent relevant and necessary for a NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you. A copy of the license issued will routinely be placed in the NRC's Public Document Room, 1717 H Street, N.W., Washington, D.C.
4. **WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION** Disclosure of the requested information is voluntary. If the requested information is not furnished, however, the application for radioactive material license, or amendment thereof, will not be processed.
5. **SYSTEM MANAGER(S) AND ADDRESS** Director, Division of Fuel Cycle and Material Safety, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555.

## RADIATION SAFETY COMMITTEE

The membership of this committee will consist of at least three members and will include:

1. the radiation safety officer
2. the hospital administrator or other administrative official directly responsible to the hospital administrator in the hospital's internal chain of command;
3. an authorized user for each type of use permitted by the license; and
4. a representative of the hospital's nursing staff.

The names and qualifications of the committee members will be documented in the committee's records, will be updated as necessary, and will be available for inspection by the NRC.

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## APPENDIX B

### RADIATION SAFETY COMMITTEE

#### Responsibility:

The committee is responsible for:

1. Ensuring that all individuals who work with or in the vicinity of radioactive material have sufficient training and experience to enable them to perform their duties safely and in accordance with NRC regulations and the conditions of the license.
2. Ensuring that all use of radioactive material is conducted in a safe manner and in accordance with NRC regulations and the conditions of the license.

#### Duties:

The committee shall:

1. Be familiar with all pertinent NRC regulations, the terms of the license, and information submitted in support of the request for the license and its amendments.
2. Review the training and experience of all individuals who use radioactive materials (including physicians, technologists, physicists, and pharmacists) and determine that their qualifications are sufficient to enable them to perform their duties safely and in accordance with NRC regulations of the license.

3. Establish a program to ensure that all individuals whose duties may require them to work in the vicinity of radioactive material (e.g., nursing, security and house-keeping personnel) are properly instructed as required by 19.12 of 10 CFR Part 19.

4. Review and approve all requests for use of radioactive material within the institution.

5. Prescribe special conditions that will be required during a proposed use of radioactive material such as requirements for bio-assays, physical examinations of users, and special monitoring procedures.

6. Review the entire radiation safety program at least annually to determine that all activities are being conducted safely and in accordance with NRC regulations and the conditions of the license. The review shall include an examination of all records, reports from the radiation safety officer, results of NRC inspections, written safety procedures, and the adequacy of the institution's management control system.

7. Recommend remedial action to correct any deficiencies identified in the radiation safety program.

8. Maintain written records of all committee meetings, actions recommendations, and decisions.

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9. Ensure that the byproduct material license is amended, when necessary, prior to any changes in facilities, equipment, policies, procedures, and personnel, as specified in the license.

Meeting Frequency:

The Radiation Safety Committee shall meet as often as necessary to conduct its business but not less than once in each calendar quarter.

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NAME OF AUTHORIZED USER

AUTHORIZATION

Donald J. Gordon, D.O.

All

For training and experience for Dr. Gordon, please refer to Lic.  
#34-16763-01.

Amend to Delete:

William E. Kay, M.D.

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APPENDIX C  
INSTRUMENTATION

1. Survey meters

a. Manufacturer's name: Victoreen

Manufacturer's model number: CDV-700 6B

Number of instruments available: 1

Minimum range: 0.0 mR/hr to .5 mR/hr

Maximum range: 0.0 mR/hr to 50 mR/hr

b. Manufacturer's name: Victoreen

Manufacturer's model number: 498

Number of instruments available: 1

Minimum range: 0.0 mR/hr to 1 mR/hr

Maximum range: 0.0 mR/hr to 1000 mR/hr

2. Dose Calibrator(s)

Manufacturer's name: Capintec

Manufacturer's model number: CRC-4

Number of instruments available: 1

3. Instruments used for diagnostic procedures

| Type of Instrument   | Manufacturer's Name             | Model No.    |
|----------------------|---------------------------------|--------------|
| Scintillation camera | Siemens Corporation<br>(Searle) | Pho/Gamma IV |

4. Other (e.g., liquid scintillation counter, area monitor, velometer)

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## CALIBRATION OF INSTRUMENTS

- A. Survey meters will be checked for operability each day of use. This will be accomplished by holding the detector against an instrument check source or the dose calibrator sealed constancy source depending on the instrument or range to be tested. If any reading with the same geometry is not within  $\pm 20\%$  of the reading displayed after calibration, the instrument will be recalibrated. The reading obtained will be included on all recorded surveys.

The units will be calibrated after servicing and at least annually by the manufacturer or by Nuclear Medicine Associates, Cleveland, Ohio, in accordance with the procedure outlined in application for NRC license #34-16272-01. Records of these calibrations will be maintained and recommendations for repair will be followed. A survey meter will not be used beyond the anniversary of its last successful calibration.

Arrangements will be made for the availability of at least one survey meter while a unit is away for calibration or repair.

- B. The dose calibrator will be calibrated as follows:

1. Sealed sources will be used to establish accuracy. They will consist of:

| <u>Nuclide</u> | <u>Suggested Activity</u> | <u>Activity (mCi)</u> | <u>Accuracy</u>  |
|----------------|---------------------------|-----------------------|------------------|
| Co-57          | 3 - 5 mCi                 | 1 mCi or more         | Within $\pm 5\%$ |
| Ba-133         | 0.1 - 0.5 mCi             | 100 uCi or more       | Within $\pm 5\%$ |
| Cs-137         | 0.1 - 0.3 mCi             | 100 uCi or more       | Within $\pm 5\%$ |

2. The accuracy of the assay of the above standards will be at least  $\pm 5\%$  and traceable to National Bureau of Standard sources.
3. The calibration procedure will be as follows:

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- a. The dose calibrator will be checked for accuracy at annual intervals and following repair using sealed sources having energies which encompass that portion of the spectrum of energies for which the dose calibrator is used. Nuclides that will be used are listed in Item 1 above.

The activity displayed by the dose calibrator must agree with the stated assay within  $\pm 5\%$  of the limits of the standard's calibration accuracy. If the unit displays readings with an error greater than  $\pm 5\%$ , arrangements will be made for immediate repair or adjustment.

- b. The dose calibrator will be checked for constancy each day of use. This will be accomplished using a Cs-137 standard. The sealed source will be placed in the chamber and the unit set to measure that nuclide. The activity displayed with background and decay considered, must fall within  $\pm 5\%$  of the predicted activity based on the value obtained at the time of the original accuracy test.

The daily constancy check will be extended to include verification of displayed activities using the same standard but with the dose calibrator set to measure each of the different nuclides to be assayed on that day. With background and decay considered, variation in displayed activities must fall within  $\pm 5\%$  of the activity shown at the time of the most recent accuracy check. If variations greater than  $\pm 5\%$  are noted, arrangements will be made for immediate repair or adjustment.

- c. The dose calibrator will be checked for activity linearity at quarterly intervals and following repair. This test will be performed using the maximum dose received from a Radiopharmacy or the first elution from a new Mo-Tc generator. In the latter case, after assaying the entire elution vial, an aliquot will be drawn calculated to contain 200 mCi. The aliquot will be assayed for agreement with the calculated activity to within  $\pm 5\%$ . If 200 mCi cannot be spared for performance of linearity testing, an aliquot less than 200 mCi will be drawn and used. The reduced amount will

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then be established as the maximum activity to be employed for patient doses or kit preparation for the remainder of the quarter or until linearity testing can be repeated utilizing a greater activity. In this way, the accuracy of the unit will be assured in the measurement of activity from the maximum on hand to a quantity approximately the maximum amount drawn and assayed for kit preparation.

To reduce personnel exposure from a whole vial measurement of activity, an alternate method of obtaining a source for the activity linearity check may be used. An aliquot such as 0.5 to 1.0 ml will be withdrawn from the elution vial and assayed in a syringe. The concentration of the eluent can be determined by dividing the displayed activity by the volume in the syringe. A 200 mCi aliquot contained in the proper volume can then be withdrawn from the elution vial and used for the linearity test. If 200 mCi cannot be used, the amount used may be less but the same restrictions as cited in the paragraph immediately preceding will apply. In this way, the accuracy of the dose calibrator will also be assured in the measurement of activities approximating the maximum quantities used for kit preparation.

The linearity test will be continued by repeating the assay of the test aliquot several times a day over a two to three day period until a measurement is made in which the activity displayed is approximately the minimum dose likely to be used in a patient study and also less than the activity displayed during the annual accuracy check utilizing the standard with the energy similar to that of Tc-99m. In this way, the accuracy of the dose calibrator will be assured in the measurement of individual doses throughout the entire ranges of doses drawn for kit preparation and patient studies.

The above linearity test data will be plotted as a function of activity vs. time and compared to predicted activities vs. the same time. The acceptable range of error will be  $\pm 5\%$ . If test result error exceeds  $\pm 5\%$ , arrangements will be

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made for immediate repair or adjustment. The unit may be used in the interim using predetermined correction factors.

As an alternative procedure, the linearity test can be performed with the use of the Calicheck Kit from Calcorp, Inc. The manufacturer's instructions for use dated 3/2/82 will be followed. The source used shall be the first elution of a new generator or the activity of the largest dose obtained from a Radiopharmacy if a Radiopharmacy is used. Limits of acceptability and corrective actions will be as described above.

- d. The dose calibrator will be tested for geometrical variation at the time of installation and following chamber or liner repair or replacement. This test will be performed using approximately 2 mCi of Tc-99m in a geometrical configuration approximating that of a point source. The source geometry will then be changed by dilution with assays performed at each step. A comparison will also be made to quantify the reduction in displayed activity caused by assaying sources in plastic versus glass containers.

The data will be analyzed relating the various readings to the reading acquired while the test source was in the geometry of the Co-57 accuracy standard. Correction factors will be used in clinical assays when geometry induced errors exceed  $\pm 2\%$ .

In the event the dose calibrator should fail or if it is away for repairs, the nuclear medicine program will be continued through the implementation of the following procedure:

1. A substitute dose calibrator will be acquired.
2. Eluents and/or doses will be assayed in a dose calibrator located at the nearest cooperating institutions having a functional and properly calibrated unit. If activities must be transported for this purpose, they will be

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shielded with sufficient lead to reduce levels to 2.0 mR/hr or less on contact with the shield, wrapped in sufficient absorbant toweling to absorb ten times the liquid volume contained in the vial or syringe, marked with labels indicating the presence of radioactivity, and carried by one occupational person assigned to this task throughout the entire trip. This same person will perform the assay, record the data, and return the activity to the location of authorized use.

Method #2 will be depended upon only in cases of medical emergency and until a functional dose calibrator can again be acquired. If only the activity of the eluent is known, mathematical calculations will be used to determine activity needed for patient doses.

The above assay techniques will enable the measurement of Technetium-99m and its Molybdenum-99 contaminant to within  $\pm 10\%$  of the true assay. Every effort will be made to expedite repair and return of the dose calibrator.

Diagnostic instrumentation will be calibrated as follows:

1. The camera pulse analyzer will be calibrated using Tc-99m or Co-57 and a uniform flood check will be performed each day of use.

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## FACILITIES AND EQUIPMENT DESCRIPTION

All radioactive sources are stored in such a manner (lead, concrete, refrigerator) so as to not exceed 2mR/hr at the surface of the barrier.

Mo-99/Tc-99m generator when used will be stored and eluted in the designated area. It will be shielded with lead bricks such that levels from all avenues of approach do not exceed 2.0mR/hr. Spent generators will be stored in the location identified in the attached diagram.

During elution, the eluate will be collected, assayed, and stored in a vial held in a quarter inch lead pig except during brief periods of transfer. Transfer of the eluate or portions of the eluate will be made by the use of syringes retained in lead shields designed for this purpose.

Eluates and compounds made from eluates will be drawn, synthesized, assayed and stored in lead vials or syringes such that levels as measured at contact with a low level survey meter do not exceed 2.0mR/hr except for brief periods during the actual transfer.

Radioactive materials obtained from radiopharmacy suppliers will be stored in their original shipping containers. If necessary, the doses will be placed behind additional shielding to reduce activity levels emitted from the container to 2mR/hr or less.

Syringe shields will be used on all accessories requiring the transfer of radiopharmaceuticals from vial to vial and in drawing up patient doses. Syringe shields will also be used in the administration of doses to patients except when the patient's well-being may be compromised. Under these circumstances, the dose containing syringes will be kept shielded up to the moment of injection.

Steps in the preparation of compounds requiring periods of heating, shaking, agitation or mixing will be performed utilizing lead shielding and/or mechanical or ultrasonic agitation equipment and/or remote handling devices (tongs, forceps, etc.) such that levels during the above period as measured by a low level survey meter do not exceed 2.0mR/hr.

Protective outer garments, such as laboratory coats and rubber gloves will be worn while handling radioactivity in uncontained form.

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All possible set-ups will be made on easily cleanable trays. All trays and all other work surfaces will be covered with disposable absorbent paper.

A decontamination kit will be maintained in the department. It will include the following items:

### DECONTAMINATION KIT

| <u>ITEM</u>                    | <u>PURPOSE</u>                             |
|--------------------------------|--|
| 1. Warning tape, chalk & signs | posting of area                            |
| 2. Plastic bags, small         | shoe covers, wet containers                |
| 3. Disposable gloves           | hand protection                            |
| 4. Masking tape                | fasten shoe covers, etc.                   |
| 5. Forceps, tongs              | safe handling                              |
| 6. Large plastic bags          | for contaminated material                  |
| 7. Sponges, 4 x 4              | sopping up                                 |
| 8. Paper towels                | blotting & drying                          |
| 9. Radiac wash or detergent    | detergent                                  |
| 10. Scouring powder            | friction                                   |
| 11. Tags                       | identification                             |
| 12. Scissors                   | cut absorbent paper, etc.                  |
| 13. Whatman #1 filter paper    | taking swipes following<br>decontamination |
| 14. Chux                       | cover area following<br>decontamination    |
| 15. G-M survey meter           | monitoring                                 |

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Facilities and Equipment

Diagram

Air Supply

Air Exhaust

Scanner

Uptake/Well

1 Camera

2 Lockable Door

3 Receipt Area

Generator

4 Kit Preparation

4 Isotope Storage

4 Dose Preparation

4 Waste Storage

5 Dose Calibrator

6 Refrigerator

Adjacent Areas

A X-ray reception area

B Hallway

C E.R. Dept.

Sink

Lead Castle

Lead Shielding

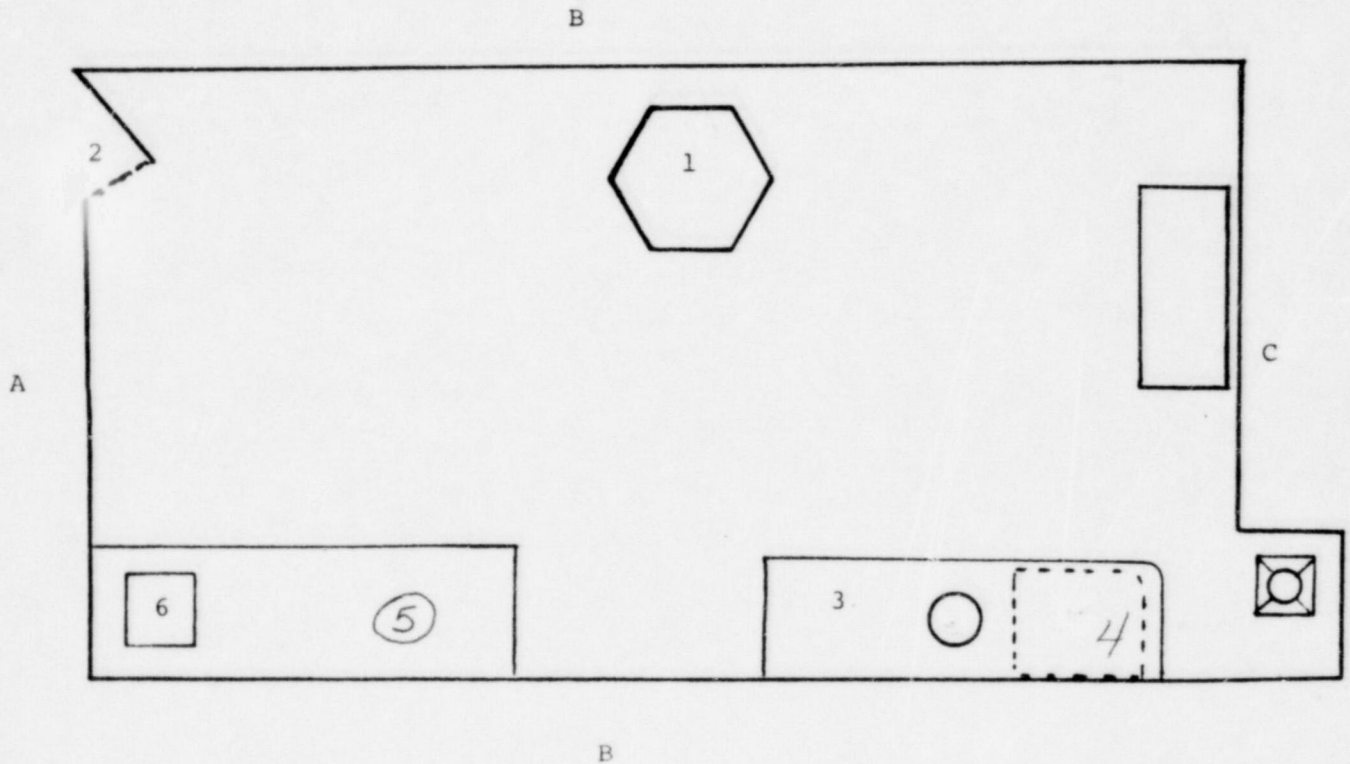
4 Storage, prep area

3' L x 2' W x 10" H x 2" T

\_\_\_ L x \_\_\_ W x \_\_\_ H x \_\_\_ T

\_\_\_ L x \_\_\_ W x \_\_\_ H x \_\_\_ T

\_\_\_ L x \_\_\_ W x \_\_\_ H x \_\_\_ T



## PERSONNEL TRAINING PROGRAM

In accordance with Section 19.12 of 10 CFR, Part 19, the following is a description of the training required for all personnel who work with or in the vicinity of radioactive materials:

1. The nuclear medicine department will be staffed by individuals who will be classified as occupational employees. These individuals will perform their duties from the radiation safety viewpoint under the direction of the physician(s) named on the license application.
2. Every effort will be made to hire nuclear medicine technology registered or registry eligible personnel to work with radioactive material. Orientation of such personnel for a day or two by the physician(s) named on the license and/or by the supervising technologist will include the following:
  - a. Indicate areas where radioactive materials are used or stored.
  - b. Potential hazards associated with radioactive materials.
  - c. Radiological safety procedures appropriate to their respective duties.
  - d. Pertinent NRC regulations.
  - e. The rules and regulations of the license.
  - f. The pertinent terms of the license.
  - g. Their obligation to report unsafe conditions.
  - h. Appropriate response to emergencies or unsafe conditions.
  - i. Their right to be informed of their radiation exposure and bioassay results.
  - j. Location where the licensee has posted or made available notices, copies of pertinent regulations, and copies of pertinent licenses and license conditions), as required by 10 CFR, Part 19.

If evaluation of the radiation handling techniques of a new technologist is found to be inadequate, arrangements will be made to send the employee for a 40 hour formal course from our consulting physicists, Nuclear Medicine Associates, Cleveland, Ohio. This course combines didactic and clinical training which will include points "b" through "i" listed above, as well as quality control and patient procedures.

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3. Our consulting physicists, mentioned in this addendum, will visit our facility quarterly to review all procedures, equipment and records. Personnel will receive refresher training relative to duties, regulations, or terms of the license during these visits or by the physician(s) named on this license application, or by supplementary training at least annually or more frequently, as needed.
  
4. Access into areas where radioactive material is stored or used will be restricted for nonoccupational personnel. When it is necessary for nonoccupational personnel to enter these areas, as in the case of certain patients who need special care, personnel so involved will be present under the direction of the nuclear medicine technologist, who will ensure that the exposure of these persons is held to the minimum required for the performance of the nuclear medicine procedure. Further, all nonoccupational personnel will receive instruction as to the location and potential hazards associated with radioactive material during their orientation process and annually thereafter in the form of verbal instructions and/or interdepartment memos.

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## PROCEDURES FOR ORDERING AND RECEIVING RADIOACTIVE MATERIAL

1. The chief nuclear medicine technologist or his/her designee will place all orders for radioactive material and will ensure that the requested materials and quantities are authorized by the license, and that possession limits are not exceeded. The receipt area identified in the Item #11 diagram is designed such that radiation levels in unrestricted areas do not exceed the limits specified in 10 CFR 20.105.
2. During normal working hours, carriers will be instructed to deliver radioactive packages directly to . If this is not practical, responsible personnel (indicated in the memorandum below) will sign for packages containing radioactive materials and immediately take them to this location. Alternatively, trained nuclear medicine personnel will sign for and transport packages to the appropriate department.
3. During off-duty hours, supervisory personnel will arrange to have delivery of radioactive packages in accordance with the procedures outlined in the following directive:

TO: Managerial Personnel of: Security, Receiving,  
Radiology, E.R.

FROM: RSO

SUBJECT: Delivery of packages containing radioactive materials

If couriers or common carriers attempt delivery of packages containing radioactive materials, the supervisor on duty will be contacted. He/she will have the carrier escorted to nuclear medicine by personnel who have been assigned this duty. Alternatively, hospital personnel will deliver the package to the receipt area. Under these conditions, people transporting the packages will receive special training for this purpose. Personnel not trained in the proper handling of radioactive materials are not to personally accept packages containing radioactive materials. The packages will be secured against unauthorized removal. When delivered packages are wet or appear to be damaged, the RSO is to be immediately contacted.\* The carrier should be requested to remain until it can be determined that neither he nor the delivery vehicle is contaminated.

\*Radiation Safety Officer:

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## APPENDIX F

### PROCEDURES FOR SAFELY OPENING PACKAGES CONTAINING RADIOACTIVE MATERIAL

1. Special requirements will be followed for packages containing quantities of radioactive material in excess of the Type A quantity limits as specified in paragraphs 20.205 (a)(1) and (c)(1) of 10 CFR Part 20 (more than 20 Ci for Mo-99 and Tc-99m). They will be monitored for surface contamination and external radiation levels within 3 hours after receipt if received during working hours or within 18 hours after receipt if received after working hours, in accordance with the requirements of paragraphs 20.205 (a) through (c). All shipments of liquids greater than exempt quantities will be tested for leakage. The NRC Regional Office will be notified in accordance with the regulations if removable contamination exceeds 0.01 uCi/100 cm<sup>2</sup> or if external radiation levels exceed 200 mR/hr at the package surface or 10 mR/hr at 1m.
2. For all packages, the following additional procedures for opening packages will be carried out:
  - a. Put on gloves to prevent hand contamination.
  - b. Visually inspect package for sign of damage (e.g., wetness, crushed). If damage is noted, stop procedure and notify Radiation Safety Officer.
  - c. Measure exposure rate at 1m from package surface and record. If > 10 mR/hr, stop procedure and notify Radiation Safety Officer.
  - d. Measure surface exposure rate and record. If > 200 mR/hr, stop procedure and notify Radiation Safety Officer.
  - e. Open the package with the following precautionary steps:
    - (1) Open the outer package (following manufacturer's directions if supplied) and remove packing slip.
    - (2) Open inner package and verify that contents agree with those on packing slip. Compare requisition\*, packing slip, and label on bottle.

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\*In the case of special order (e.g., therapy doses) also compare with physician's written request.

- (3) Check integrity of final source container (i.e., inspect for breakage of seals or vials, loss of liquid, and discoloration of packaging material).
  - (4) Check also that shipment does not exceed possession limits.
- f. Wipe external surface of final source container shield and remove wipe to low background area. Check wipes with a thin-end window G-M survey meter, and take precaution against the spread of contamination as necessary.
- g. Monitor the packing material and packages for contamination before discarding.
- (1) If contaminated, treat as radioactive waste.
  - (2) If not contaminated, obliterate radiation labels before discarding in regular trash.
3. Maintain records of the results of checking each package.

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ADDENDUM ITEM #14

The procedure for safely opening packages containing radioactive materials as outlined in Appendix F, Licensing Guide 10.8 will be subscribed to with the following exceptions. The procedures shall not be applicable to prepackaged in vitro kits received without evidence of shipping damage except that radiation labels will be obliterated. Evaluation of final source container wipe smears will be performed with a survey meter listed in Item #9 of license application.

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GENERAL RULES FOR THE SAFE USE OF RADIOACTIVE MATERIAL IN  
THE NUCLEAR MEDICINE DEPARTMENT

1. Wear laboratory coats or other protective clothing at all times in areas where radioactive materials are used.
2. Wear disposable gloves at all times while handling radioactive materials.
3. Monitor hands and clothing for contamination after each procedure or before leaving the area.
4. Always use syringe shields for routine preparation of patient doses and administration to patients, except in circumstances such as pediatric cases when their use would compromise the patient's well-being. In these exceptional cases, use other protective methods such as remote delivery of the dose (e.g., through use of a butterfly valve).
5.
  - a. Do not eat, drink, smoke, or apply cosmetics in any area where radioactive material is stored or used.
  - b. Do not store food, drink, or personal effects with radioactive material.
6.
  - a. Assay each patient dose in the dose calibrator prior to administration. Do not use any doses that differ from the prescribed dose by more than 10 percent.
  - b. For therapeutic doses, also check the patient's name, the radionuclide, the chemical form, and the activity vs. the order written by the physician who will perform the procedure.
7. Wear personnel monitoring devices (film badge or TLD) at all times while in areas where radioactive materials are used or stored. These devices should be worn at chest or waist level. Personnel monitoring devices when not being worn to monitor occupational exposures should be stored in a designated low background area.
8. Wear TLD finger badges during elution of generator and preparation, assay, and injection of radiopharmaceuticals.
9. Dispose of radioactive waste only in specially designated and properly shielded receptacles.

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10. Never pipette by mouth.
11. Survey generator, kit preparation, and injection areas for contamination after each procedure or at the end of the day. Decontaminate if necessary.
12. Confine radioactive solutions in covered containers plainly identified and labeled with name of compound, radionuclide, date, activity, and radiation level, if applicable.
13. Always transport radioactive material in shielded containers.

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ADDENDUM ITEM #15

General rules for the safe use of radioactive materials, as outlined in Appendix G of the Licensing Guide will be subscribed to at this institution. Additionally, authorization is requested to dispose of the following records subsequent to NRC inspection of these records.

1. Dose calibrator accuracy, constancy and linearity checks.
2. Survey meter calibration records.
3. Instrument calibration and quality assurance records.  
(e.g., camera, well, uptake probe, etc.)
4. Records of training for occupational and nonoccupational personnel.
5. Radiation Safety Committee minutes.

Provided that:

1. The record was examined during a routine NRC inspection.
2. The record is in excess of two years from the date of generation.
3. Disposal of the record does not conflict with the requirements of other state and federal agencies.

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APPENDIX H  
EMERGENCY PROCEDURES

Minor Spills

1. NOTIFY: Notify persons in the area that a spill has occurred.
2. PREVENT THE SPREAD: Cover the spill with absorbent paper.
3. CLEAN UP: Use disposable gloves and remote handling tongs. Carefully fold the absorbent paper and pad. Insert into a plastic bag and dispose of in the radioactive waste container. Also insert into the plastic bag all other contaminated materials such as disposable gloves.
4. SURVEY: With a low-range, thin window G-M survey meter, check the area around the spill, hands and clothing for contamination.
5. REPORT: Report incident to the Radiation Safety Officer.

Major Spills

1. CLEAR THE AREA: Notify all persons not involved in the spill to vacate room.
2. PREVENT THE SPREAD: Cover the spill with absorbent pads, but do not attempt to clean it up. Confine the movement of all personnel potentially contaminated to prevent the spread.
3. SHIELD THE SOURCE: If possible, the spill should be shielded, but only if it can be done without further contamination or without significantly increasing your radiation exposure.
4. CLOSE THE ROOM: Leave the room and lock the door(s) to prevent entry.
5. CALL FOR HELP: Notify the Radiation Safety Officer immediately.
6. PERSONNEL DECONTAMINATION: Contaminated clothing should be removed and stored for further evaluation by the Radiation Safety Officer. If the spill is on the skin, flush thoroughly and then wash with mild soap and lukewarm water.

RADIATION SAFETY OFFICER: Donald J. Gordon, D.O.  
OFFICE PHONE: (216) 428-2121 Ext. 277 HOME PHONE: (216) 428-6297

ALTERNATIVE NAMES AND TELEPHONE NUMBERS DESIGNATED BY RADIATION SAFETY OFFICER:

Linda Smith: (216) 942-0394  
Loretta Montgomery: (216) 428-5805

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## SURVEY PROCEDURES

- A. Routine elution, preparation and designated injection areas will be surveyed daily with a G-M survey meter and decontaminated, if necessary.
- B. Laboratory areas where only small quantities of radioactive material are used (less than 200 uCi) will be surveyed monthly.
- C. All other laboratory areas will be surveyed weekly.
- D. The weekly and monthly survey will consist of:
  - 1. A measurement of radiation levels with a survey meter sufficiently sensitive to detect 0.1 mR/hr.
  - 2. A series of wipe tests to measure contamination levels. Analysis of wipe tests will be performed using a low level G-M survey meter.

The procedure will be as follows:

- a. Perform wipe tests.
- b. Place smear(s) in a "baggy" or disposable glove.
- c. Adjust response time to the longest time constant, if applicable.
- d. Select most sensitive range.
- e. Turn beta shield on probe to open position.
- f. Wait until reading stabilizes.
- g. Read and record background.
- h. Place smear in contact with open position of probe.
- i. Wait until the reading stabilizes.
- j. Read and record wipe results.

Action levels for smear analysis using the G-M survey meter will be set at any response above background. If action levels of removable contamination are found, decontamination efforts will be initiated to provide for clean-up or to prevent spread. In order to avoid unnecessary personnel exposure, contamination strongly suspected as being caused by Tc-99m may be shielded and/or covered to prevent spread and be allowed to decay.

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E. A permanent record will be kept of the weekly or monthly survey results, including negative results. The record will include:

1. Location, date and type of equipment used.
2. Name of person conducting the survey.
3. Drawing of area surveyed, identifying relevant features such as active storage areas, active waste areas, etc.
4. Measured exposure rates, keyed to location on drawing (point out rates that require corrective action).
5. Detected contamination levels, keyed to locations on drawing.
6. Corrective action taken in the case of contamination or excessive exposure rates, reduced contamination levels or exposure rates after corrective action, and any appropriate comments.

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APPENDIX J

WASTE DISPOSAL

1. Liquid waste will be disposed of:

- A. In the sanitary sewer system in accordance with 20.303 of 10 CFR, Part 20.
- B. Held for decay until radiation levels, as measured in a low background area with a low-level survey meter and with all shielding removed, have reached background levels. All radiation labels will be removed or obliterated, and the generators will be disposed of as normal trash.
- C. Other (specify): Return to radiopharmacy.

2. Mo-99/Tc-99m generators will be:

- A. Returned to manufacturer for disposal.
  - B. Held for decay until radiation levels, as measured in a low background area with a low-level survey meter and with all shielding removed, have reached background levels. All radiation labels will be removed or obliterated, and the generators will be disposed of as normal trash.
  - C. Disposed of by commercial waste disposal service.
- 
- D. Other (specify): Return to radiopharmacy.

3. Other solid waste will be:

- A. Held for decay until radiation levels, as measured in a low background area with a low-level survey meter and with all shielding removed, have reached background levels. All radiation labels will be removed or obliterated, and the waste will be disposed of in normal trash.
  - B. Disposed of by commercial waste disposal service.
- 
- C. Other (specify): Return to radiopharmacy.

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Model Program for Maintaining Occupational  
Radiation Exposures at Medical Institutions ALARA

Northeastern Ohio General Hospital  
(Licensee's Name)

March 14, 1986  
(Date)

I. Management Commitment

- a. We, the management of this (medical facility, hospital, etc.) are committed to the program described in this paper for keeping exposures (individual and collective) as low as reasonably achievable (ALARA). In accord with this commitment, we hereby describe an administrative organization for radiation safety and will develop the necessary written policy, procedures and instructions to foster the ALARA concept within our institution. The organization will include a Radiation Safety Committee (RSC)<sup>1</sup> and a Radiation Safety Officer (RSO).
- b. We will perform a formal annual review of the radiation safety program including ALARA considerations. This shall include reviews of operating procedures and past exposure records, inspections, etc., and consultations with the radiation protection staff or outside consultants.
- c. Modification to operating and maintenance procedures and to equipment and facilities will be made where they will reduce exposures unless the cost, in our judgement, is considered to be unjustified. We will be able to demonstrate, if necessary, the improvements have been sought, that modifications have been considered, and that they have been implemented where reasonable. Where modifications have been recommended but not implemented, we will be prepared to describe the reasons for not implementing them.
- d. In addition to maintaining doses to individuals as far below the limits as is reasonably achievable, the sum of the doses received by all exposed individuals will also be maintained at the lowest practicable level. It would not be desirable, for example, to hold the highest dose to individuals to some fraction of the applicable limit if this involved exposing additional people and significantly increasing the sum of radiation doses received by all involved individuals.

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<sup>1</sup> Private practice physician licenses do not include a RSC.

## II. Radiation Safety Committee (RSC)<sup>2</sup>

### a. Review of Proposed Users and Uses

1. The RSC will thoroughly review the qualifications of each applicant with respect to the types and quantities of materials and uses for which he has applied to assure that the applicant will be able to take appropriate measures to maintain exposure ALARA.
2. When considering a new use of byproduct material, the RSC will review the efforts of the applicant to maintain exposure ALARA. The user should have systematized procedures to ensure ALARA, and shall have incorporated the use of special equipment such as syringe shields, rubber gloves, etc., in his proposed use.
3. The RSC will ensure that the user justifies his procedures and that doses will be ALARA (individual and collective).

### b. Delegation of Authority

(The judicious delegation of RSC authority is essential to the enforcement of an ALARA program).

1. The RSC will delegate authority to the RSO for enforcement of the ALARA concept.
2. The RSC will support the RSO in those instances where it is necessary for the RSO to assert his authority. Where the RSO has been overruled, the Committee will record the basis for its action in the minutes of the Committee's quarterly meeting.

### c. Review of ALARA Program

1. The RSC will encourage all users to review current procedures and develop new procedures as appropriate to implement the ALARA concept.
2. The RSC will perform a quarterly review of occupational radiation exposure with particular attention to instances where Investigational Levels in Table I below are exceeded. The principle purpose of this

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<sup>2</sup> The RSO on private practice physician licenses will assume the responsibilities of the RSC under Section II.

review is to assess trends in occupational exposure as an index of the ALARA program quality and to decide if action is warranted when Investigational Levels are exceeded (see paragraph VI).<sup>3</sup>

3. The RSC will evaluate our institution's overall efforts for maintaining exposures ALARA on an annual basis. This review will include the efforts of the RSO, authorized users, and workers as well as those of management.

### III. Radiation Safety Officer (RSO)

#### a. Annual and Quarterly Review

1. Annual review of the Radiation Safety Program. The RSO will perform an annual review of the Radiation Safety Program for adherence to ALARA concepts. Reviews of specific procedures may be conducted on a more frequent basis.
2. Quarterly review of Occupational Exposures. The RSO will review at least quarterly the external radiation exposures of authorized users and workers to determine that their exposures are ALARA in accordance with the provisions of paragraph VI of this program.
3. Quarterly review of records of Radiation Level Surveys. The RSO will review radiation levels in unrestricted and restricted areas to determine that they were at ALARA levels during the previous quarter.

#### b. Education Responsibilities for an ALARA Program

1. The RSO will schedule briefings and educational sessions to inform workers of ALARA program efforts.
2. The RSO will assure that authorized users, workers and ancillary personnel who may be exposed to radiation will be instructed in the ALARA philosophy and informed that management, the RSC and the RSO are committed to implementing the ALARA concept.

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<sup>3</sup> The NRC has emphasized that the Institutional Levels in this program are not new dose limits but, as noted in ICRP Report 26, "Recommendations of the International Commission on Radiological Protection", serve as check points above which the results are considered sufficiently important to justify further investigation.

c. Cooperative Efforts for Development of ALARA Procedures

1. The RSO will be in close contact with all users and workers in order to develop ALARA procedures for working with radioactive materials.
2. The RSO will establish procedures for receiving and evaluating the suggestions of individual workers for improving health physics practices and encourage the use of those procedures.

d. Reviewing Instances of Deviation from Good ALARA Practices

The RSO will investigate all known instances of deviation from good ALARA practices; and, if possible, determine the causes. When the cause is known, the RSO will require changes in the program to maintain exposures ALARA.

IV. Authorized Users

a. New Procedures Involving Potential Radiation Exposures

1. The authorized user will consult with, and receive the approval of, the RSO and/or RSC during the planning stage before using radioactive materials for a new procedure.
2. The authorized user will evaluate all procedures before using radioactive materials to ensure that exposures will be kept ALARA. This may be enhanced through the application of trial runs.

b. Responsibility of the Authorized User to Those He Supervises

1. The authorized user will explain the ALARA concept and his commitment to maintain exposures ALARA to all of those he supervises.
2. The authorized user will ensure that those under his supervision who are subject to occupational radiation exposure are trained and educated in good health physics practices and in maintaining exposures ALARA.

V. Persons Who Receive Occupational Radiation Exposure

- a. The worker will be instructed in the ALARA concept and its relationship to his working procedures and work conditions.

- b. The worker will know what recourses are available if he feels that ALARA is not being promoted on the job.

VI. Establishment of Investigational Levels in Order to Monitor Individual Occupational External Radiation Exposures

This institution (or private practice) hereby established Investigational Levels for occupational external radiation exposure which, when exceeded, will initiate review or investigation by the Radiation Safety Committee and/or the Radiation Safety Officer. The Investigational Levels that we have adopted are listed in Table I below. These levels apply to the exposure of individual workers.

TABLE I

|    |  | Investigational levels -<br>(mrems per calendar quarter) |                 |
|----|--|--|-----------------|
|    |  | <u>LEVEL I</u>   | <u>LEVEL II</u> |
| 1. | Whole body; head and trunk;<br>active blood-forming organs;<br>lens of eyes; or gonads | 125  | 375             |
| 2. | Hands and forearms; feet<br>and ankles   | 1875   | 5625            |
| 3. | Skin of whole body*  | 750  | 2250            |

\*Not normally applicable to nuclear medicine operations except those using significant quantities of beta emitting isotopes.

The Radiation Safety Officer will review and record on Form NRC 5, Current Occupational External Radiation Exposures, or an equivalent form (e.g. dosimeter processor's report), results of personnel monitoring, not less than once in any calendar quarter, as is required by 10 CFR 20, 20.410. The following actions will be taken at the Investigational Levels as stated in Table I:

- a. Quarterly exposure of individuals to less than Investigational Level I.

Except when deemed appropriate by the RSO, no further action will be taken in those cases where an individual's exposure is less than Table I values for the Investigational Level I.

- b. Personnel exposures equal to or greater than Investigational Level I, but less than Investigational Level II.

The RSO will review the exposure of each individual whose quarterly exposures equal or exceed Investigational Level I. He will report the results of his reviews at the first RSC meeting following the quarter when the exposure was recorded. If the exposure does not equal or exceed Investigational Level II, no action related specifically to the exposure is required unless deemed appropriate by the Committee. The Committee will, however, consider each such exposure in comparison with those of others performing similar tasks as an index of ALARA program quality and will record the review in the Committee minutes.

- c. Exposure equal to or greater than Investigational Level II.

The RSO will investigate in a timely manner the cause(s) of all personnel exposures equaling or exceeding Investigational Level II and, if warranted, take action. A report of the investigation, actions taken, if any, and a copy of the individual's Form NRC-5 or its equivalent will be presented to the RSC at the first RSC meeting following completion of the investigation. The details of these reports will be recorded in the Committee minutes. Committee minutes will be sent to the management of this institution for review. The minutes, containing details of the investigation, will be made available to NRC inspectors for review at the time of the next inspection.

- d. Re-establishment of an individual occupational worker's Investigational Level II above that listed in Table I.

In cases where a worker's or a group of worker's exposures need to exceed Investigational Level II, a new, higher Investigational Level II may be established on the basis that it is consistent with good ALARA practices for that individual or group. Justification for a new Investigational Level II will be documented.

The Radiation Safety Committee will review the justification for, and will approve, all revisions of Investigational Levels II. In such cases, when the exposure equals or exceeds the newly established Investigational Level II, those actions listed in paragraph c above will be followed.

VII. Signature of Certifying Official<sup>4</sup>

I hereby certify that his institution (or private practice),  
has implemented the ALARA Program set forth above.

Neil Gilman  
Signature

Neil Gilman  
Name (print or type)

Administrator  
Title

Institution (or Private Practice) Name and Address:

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<sup>4</sup> The individual who is authorized to make commitments for the  
administration of the institution (e.g., hospital  
administrator, etc.) or, in the case of private practice the  
licensed physician.