

SEP 11 1986

FCML:PCV  
(019673)  
030-01216

Department of the Navy  
Naval Hospital  
ATTN: Commanding Officer  
Oakland, California 94627-5000

Gentlemen:

Enclosed please find Amendment No. 66 to License No. 04-00716-02 that has been issued in response to your March 28, 1986 request. We have amended your license in its entirety for the convenience of the Commission and to combine in one document several amendments to your license that have been issued since 1981. Please note that we did not extend the expiration date; your license is still considered to be "deemed timely filed" as described in 10 CFR 2.109; see Enclosure 2.

Please review your amended license carefully to be sure you understand all of its conditions and provisions. If there are any errors or questions, please notify us through your normal chain of command so that we can provide appropriate corrections and answers.

We would like to call attention to several changes made in your license.

- ° The listings in Subitems G-Q reflect the authorizations in Amendments 59-65, your March 28, 1986 amendment request, and the revised authorizations listed in your renewal request.
- ° Please note that the use of iodine-125 in a Lunar Model SP2 bone mineral analyzer is not a separate entry on Amendment No. 66. As you noted, iodine-125 sources for use in bone mineral analyzers are listed in Group VI of 10 CFR 35.100 and you may obtain them from appropriately licensed suppliers; see 10 CFR 35.14(b)(3), copy enclosed. Lunar Radiation has recently become appropriately licensed.
- ° If you find that the 2 curie possession limit in Subitem 6.E. is no longer sufficient for your needs, please submit an amendment request through your chain of command and we will be pleased to consider it.
- ° Conditions 11.B., 11.C., and 19 have been revised to reflect current policy; copies of referenced documents are enclosed.

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SURNAME ▶	.....	NMSS LIC30	.....	.....	.....	.....
DATE ▶	.....	04-00716-02 PDR	.....	.....	.....	.....

- ° Several conditions were deleted because they are duplicative (e.g., "old" Conditions 17 and 24), they are no longer routinely used (e.g., "old" Condition 11), or their requirements are adequately addressed in the regulations (e.g., "old" Condition 18 is covered in 10 CFR 30.34(g) and 35.14(b)(4); copies of these regulations are enclosed).

From a brief review of your license file, pending renewal request, and your March 28, 1986 letter, it appears that there are several matters that should be incorporated into your license as soon as possible.

1. Although your March 28, 1986 letter indicates that LCDR M. P. Grissom is your Radiation Safety Officer (RSO), your previously submitted documents had named LCDR Laurence Parr as RSO. If LCDR Grissom has replaced LCDR Parr and you wish us to approve him as your RSO, please describe LCDR Grissom's training and experience that qualify him for this position. You may find it convenient to provide this information using the enclosed Supplement A or a format patterned after Supplement A.
2. With regard to your use of the Lunar Radiation Model DP3 device containing gadolinium-153, please:
  - a. Specify who will install the original radioactive source and provide a description of that individual's training and experience if you have not submitted his/her qualifications previously;
  - b. Provide information similar to that requested in Item 2.a. above with respect to the individual who will exchange sources;
  - c. Submit a description of the procedures that will be followed for installing and/or exchanging sources.
3. Your March 28, 1986 letter indicates that the Lunar Radiation bone mineral analyzers (both the SP2 and DP3 models) will be located on the ninth floor near the mobile nuclear medicine camera. However, your January 27, 1984 letter stated that "[n]o radioactive materials will be stored in this room." Please describe how the bone mineral analyzers containing licensed material will be secured from unauthorized use or removal from storage except when they are under "constant surveillance and immediate control."
4. If you wish to authorize a physician to use only the bone mineral analyzer or the lixiscopes (e.g., an OB/GYN or an orthopedic physician), you should specify the minimum training and experience these physicians must have. Enclosure 7 describes criteria we find acceptable.

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At your earliest opportunity, you should submit, through your chain of command, a request to amend License No. 04-00716-02 that addresses the four matters outlined above.

Sincerely,

Patricia C. Vacca  
Material Licensing Branch  
Division of Fuel Cycle and  
Material Safety

Enclosures:

1. Amendment No. 66 To License No. 04-00716-02
2. Excerpt from 10 CFR Part 2
3. 10 CFR Part 30, 35
4. 47 FR 54376
5. Regulatory Guide 10.8 (Rev. 1) dtd. Oct. 1980
6. Supplement A
7. Policy and Guidance Directive FC 85-01

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