NRC FORM 313
(1-84)
10 CFR 30, 32, 33, 34, 35 and 40

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED BY OMB
3150-0120
Expires: 5-31-87

APPLICATION FOR MATERIAL LICENSE

RECEIVED
JUN 20 1988

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

FEDERAL AGENCIES FILE APPLICATIONS WITH:

U.S. NUCLEAR REGULATORY COMMISSION
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY, NMSS
WASHINGTON, DC 20555

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS, IF YOU ARE LOCATED IN:

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION I
NUCLEAR MATERIAL SECTION B
631 PARK AVENUE
KING OF PRUSSIA, PA 19406

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION II
MATERIAL RADIATION PROTECTION SECTION
101 MARIETTA STREET, SUITE 2900
ATLANTA, GA 30323

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION III
MATERIALS LICENSING SECTION
799 ROOSEVELT ROAD
GLEN ELLYN, IL 60137

ARKANSAS, COLORADO, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, SOUTH DAKOTA, TEXAS, UTAH, OR WYOMING, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
MATERIAL RADIATION PROTECTION SECTION
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TX 76011

ALASKA, ARIZONA, CALIFORNIA, HAWAII, NEVADA, OREGON, WASHINGTON, AND U.S. TERRITORIES AND POSSESSIONS IN THE PACIFIC, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION V
MATERIAL RADIATION PROTECTION SECTION
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CA 94596

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTION.

1. THIS IS AN APPLICATION FOR *(Check appropriate item)*

- [X] A. NEW LICENSE
- [ ] B. AMENDMENT TO LICENSE NUMBER _____
- [ ] C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT *(Include Zip Code)*

Hot Springs County Memorial Hospital
Hot Springs Park
Thermopolis, Wyoming 82443

3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED.

Same as 2.

8907280051 880726
REG4 LIC30
49-26949-01 PDR

(030- 30651)
NRM 26949

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Aubrey D. Wills, M.D.

TELEPHONE NUMBER: 307-864-3121

SUBMIT ITEMS 5 THROUGH 11 ON 8½ x 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL
a. Element and mass number, b. chemical and/or physical form, and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSEE FEES *(See 10 CFR 170 and Section 170.31)*
FEE CATEGORY C7-Exempt 170.11 AMOUNT ENCLOSED $0.00

13. CERTIFICATION. *(Must be completed by applicant)* THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, AND 40 AND THAT ALL INFORMATION CONTAINED HEREIN, IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948, 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

SIGNATURE–CERTIFYING OFFICER	TYPED/PRINTED NAME	TITLE	DATE
N. Alexander Bowler	N. ALEXANDER BOWLER	Administrator	6/15/88

14. VOLUNTARY ECONOMIC DATA

a. ANNUAL RECEIPTS

- [ ] <$250K
- [ ] $250K–500K
- [ ] $500K–750K
- [ ] $750K–1M
- [ ] $1M–3.5M
- [✓] $3.5M–7M
- [ ] $7M–10M
- [ ] >$10M

b. NUMBER OF EMPLOYEES *(Total for entire facility excluding outside contractors)* 100

c. NUMBER OF BEDS 49

d. WOULD YOU BE WILLING TO FURNISH COST INFORMATION *(Dollar and/or staff hours)* ON THE ECONOMIC IMPACT OF CURRENT NRC REGULATIONS OR ANY FUTURE PROPOSED NRC REGULATIONS THAT MAY AFFECT YOU? *(NRC regulations permit it to protect confidential commercial or financial–proprietary–information furnished to the agency in confidence)*

- [✓] YES
- [ ] NO

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	COMMENTS	APPROVED BY
Appl	Jun-5-IV	17C	FEE EXEMPT 170.11(a)(4) Code 13	M. Hansen
AMOUNT RECEIVED	CHECK NUMBER			DATE 6/24/88

PRIVACY ACT STATEMENT ON THE REVERSE

46202

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 313. 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, 32, 33, 34, 35 and 40 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 (a) provided to State health departments for their information and use; and (b) provided 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 an NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you.

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. A request that information be held from public inspection must be in accordance with the provisions of 10 CFR 2.790. Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned need to inspect the document.

5. **SYSTEM MANAGER(S) AND ADDRESS:** U.S. Nuclear Regulatory Commission
Director, Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555

ITEM 5 & 6 - RADIOACTIVE MATERIAL AND PURPOSE

	BYPRODUCT MARTEIAL	AMOUNT	PURPOSE
5.a	MATERIAL IN 35.100	AS NEEDED	6.a MEDICAL USE
5.b	MATERIAL IN 35.200 except radioactive gases	AS NEEDED	6.b MEDICAL USE
5.c	MATERIAL IN 35.500	AS NEEDED	6.c MEDICAL USE

ITEM 7 - INDIVIDUALS RESPONSIBLE FOR RADIATION SAFETY PROGRAMS - THEIR TRAINING AND EXPERIENCE

AUBREY D. WILLS, M.D. is the only requested authorized user. His qualifications are currently on file under NRC license number 49-17061-01, issued to Washakie Memorial Hospital, P.O. BOX 700, Worland, Wyoming 82401.

AUBREY D. WILLS, M.D. will also be the RSO.

VICTOR M. SPITZER, Ph.D., ABR certified in Medical Nuclear Physics, Denver, Colorado, is available as a consultant to assist the RSO.

Item 8 - TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS

8.1 We will establish and implement the model training program that was published in Appendix A to Regulatory Guide 10.8, Revision 2, and have appended ATT 8.1 that identifies the groups of workers who will receive training and the method and frequency of training.

8.2 Other Training

Not applicable

Item 9 - FACILITIES AND EQUIPMENT

9.1 Annotated Drawing

The nuclear medicine imaging facility, dose preparation room and storage areas are indicated in the appended drawings, ATT 9.1.1 and 9.1.2

9.2 Survey Instrument Calibration

We will establish and implement the model procedure for calibrating survey instruments that was published in Appendix B to Regulatory Guide 10.8, Revision 2. Survey instruments will be calibrated by a contractor with a radioactive source at least annually and after servicing.

9.3 Dose Calibrator Calibration

We will establish and implement the model procedure for calibrating our dose calibrator that was published in Appendix C to Regulatory Guide 10.8, Revision 2. Constancy will be checked with Co-57 or Cs-137 at installation, after repair, adjustment or relocation and at least once each day prior to assay of patient dosages. Linearity will be checked at installation and at least quarterly thereafter. It will also be checked after repair, major adjustment or relocation of the dose calibrator. The geometry check will be performed at installation and after detector service or exchange. Accuracy checks will be made at installation and at least annually thereafter. They will also be performed after repair, adjustment or relocation of the dose calibrator.

9.4 Personnel Monitor Program

We will establish and implement the model personnel external exposure monitoring program published in Appendix D to Regulatory Guide 10.8, Revision 2.

9.5 Imaging Equipment

Not applicable

9.6 Other Equipment and Facilities

Not applicable

Item 10 - RADIATION SAFETY PROGRAM

10.1 Radiation Safety Committee/Radiation Satfety Officer

We will issue the model Radiaition Safety Committee Charter and Radiation Safety Officer Delegation of Authority that was published in Appendix F to Regulatory Guide 10.8, Revision 2.

10.2 ALARA Program

We will establish and implement the model ALARA program that was published in Appendix G to Regulatory Guide 10.8, Revision 2. A signed copy of Appendix G is appended as ATT 10.2.

10.3 Leak Test

We will establish and implement the model procedure for leak-testing sealed sources that was published in Appendix H to Regulatory Guide 10.8, Revision 2. Sealed source leak tests will be performed on acquisition of the source and annually thereafter.

10.4 Safe Use of Radiopharmaceuticals

We will establish and implement the model safety rules published in Appendix I to Regulatory Guide 10.8, Revision 2.

10.5 Spill Procedures

We will establish and implement the model spill procedures published in Appendix J to Regulatory Guide 10.8, Revision 2.

10.6 Ordering and Receiving

We will establish and implement the model guidance for ordering and receiving radioactive material that was published in Appendix K to Regulatory Guide 10.8, Revision 2.

10.7 Opening Packages

We will establish and implement the model procedure for opening packages that was published in Appendix L to Regulatory Guide 10.8, Revision 2.

10.8 Unit dosage Records

At the present time there is not a suplier of unit dosage products to the area but in the event one becomes available We will establish and implement the model procedure for a unit dose record system that was published in Appendix M.1 to Regulatory Guide 10.8, Revision 2.

10.9 Multidose Vial Records

We will establish and implement the model procedure for a multidose vial record system that was published in Appenmdix M.2 to Regulatory Guide 10.8, Revision 2.

10.10 Molybdenum Concentration Records

We will establish and impllement the model procedure for measuring and recording molybdenum concentration that was published in Appendix M.3 to Regulatory Guide 10.8, Revision 2. Each technetium generator elution will be tested for its molybdenum concentration with a molybdenum breakthrough pig in the dose calibrator. No radiopharmaceuticals that contain more than 0.15 microcurie of Mo-99m per millicurie of Tc-99m at the proposed time of administration will be used.

10.11 Implant Source Use Records

Not applicable

10.12 We will establish and implement the model procedure for area surveys that was established in Appendix N to Regulatory Guide 10.8, Revision 2.

10.13 Air Concentration Control

Not applicable

10.14 Radiopharmaceutical Therapy

Not applicable

10.15 Implant therapy

Not applicable

10.16 Other Safety Procedures

Not applicable

Item 10 cont'

Item 11 - WASTE MANAGEMENT

11.1 Waste Disposal

We will esatblish and implement the general guidance and model procedures for waste disposal that were published in Appendix R to Regulatory Guide 10.8, Revision 2.

11.2 Other Waste Disposal

Not applicable

TRAINING FOR INDIVIDUALS WORKING IN OR NEAR RESTRICTED AREAS

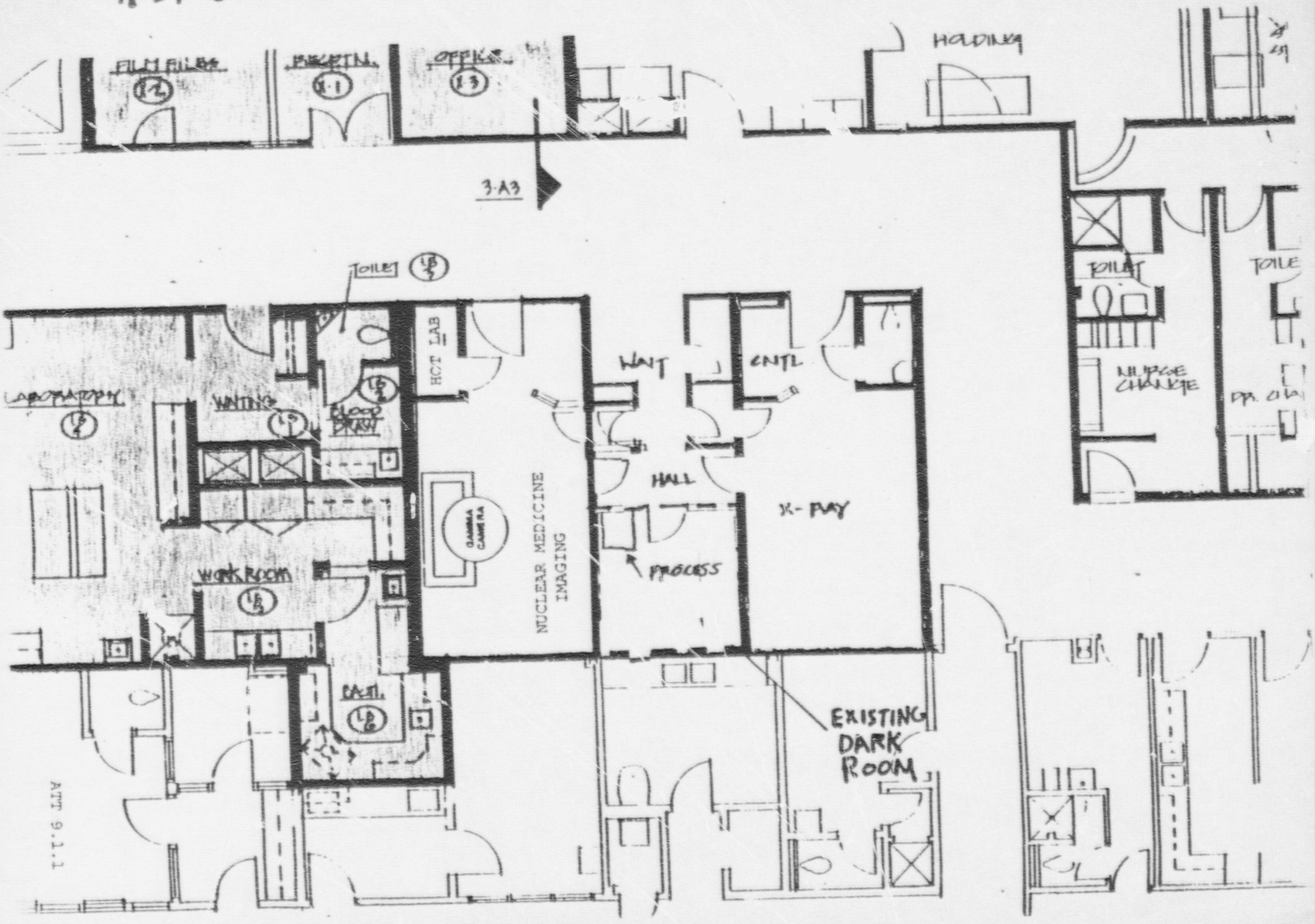
The nuclear medicine workload will be handled by one radiologist. A primary technologist with competence in nuclear medicine will generally be responsible for radioisotope procedures. There is no security staff, as such, at the hospital. The maintenance staff is responsible for security procedures. Housekeeping will be restricted from the radioisotope preparation room.

All personnel frequenting the nuclear medicine restricted area will be issued a memo describing the scope of the diagnostic procedures in this license, the possible radiation exposure, the mechanism for reporting suspected problems and the availability of further information on the subject (available through audiovisual presentations and lectures). They will be issued this memo at the time of their employment or at the issuance of this license, whichever comes first. They will also be updated via this mechanism of any consequential changes to the license which would efffect their potential exposure. Groups included in this category for training include all nursing and maintenance staff and housekeeping and clerical staff in the area of nuclear medicine.

Dr. Wills, the nuclear medicine technologist and any radiographic technologist who covers the nuclear medicine service will receive annual training with available video tapes, lectures and/or attendance at scientific meetings. All training will be documented.

SCALE
1/8" = 1'-0"

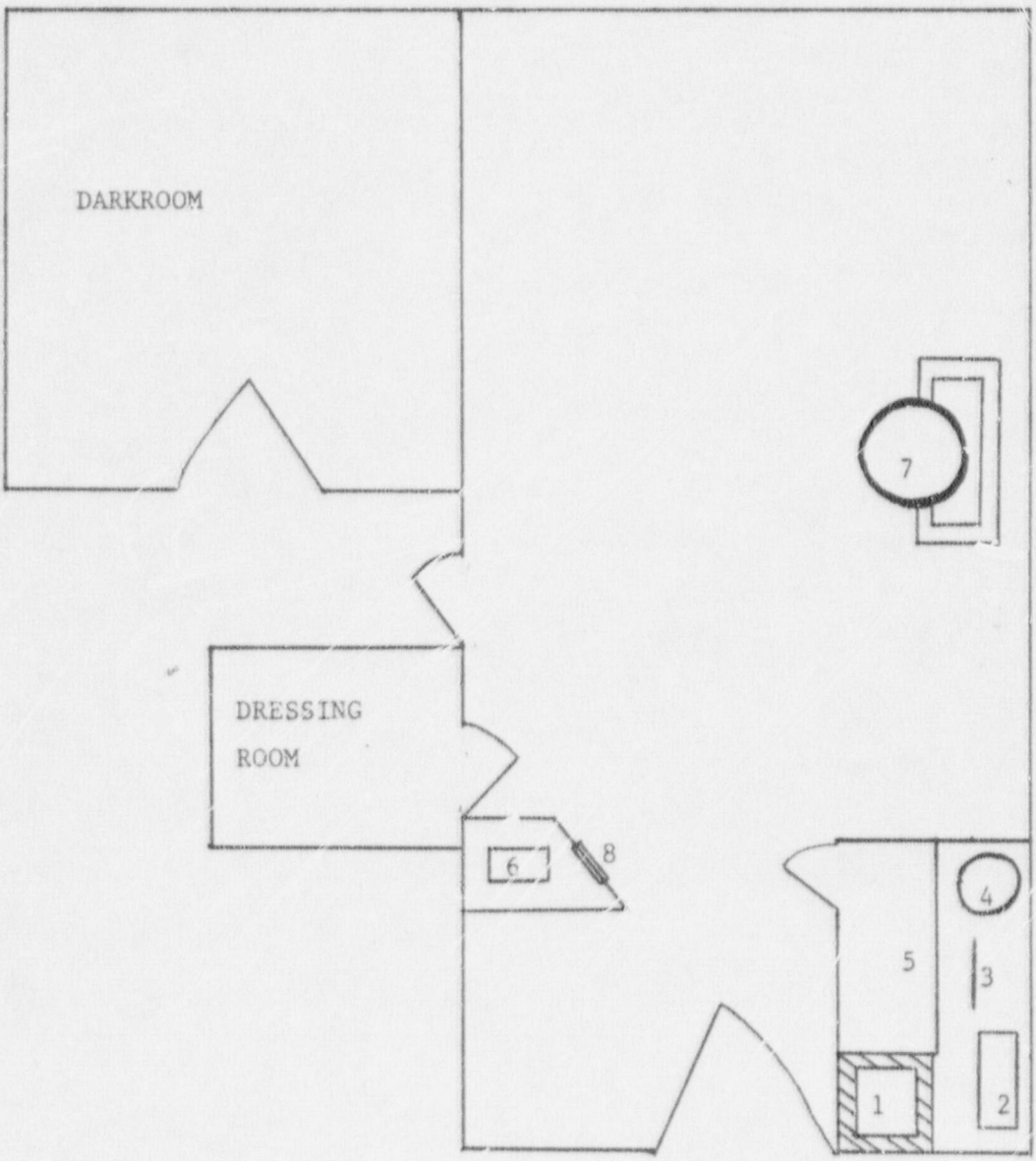
NUCLEAR MEDICINE and SURROUNDING AREAS



ATT 9.1.1

The Nuclear Medicine facility is a converted radiographic and fluoroscopic room. All walls are filled block and lead lined.

SCALE ¼" equals 1'



1. Lead brick storage
2. Shielded generator
3. Work shield
4. Hot sink
5. Under counter lead lined waste
6. Dose calibrator
7. Gamma camera
8. Lead window

APPENDIX G

Model Program for Maintaining Occupational Radiation Exposure
at Medical Institutions ALARA
(See § 35.20.)

ALARA PROGRAM

Hot Springs County Memorial Hospital
(Licensee's Name)

6-15-88
(Date)

1. Management Commitment

   a. We, the management of this (medical facility, hospital, etc.), are committed to the program described herein for keeping individual and collective doses as low as is 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) and a Radiation Safety Officer (RSO).

   b. We will perform a formal annual review of the radiation safety program, including ALARA considerations. This will include reviews of operating procedures and past dose records, inspections, etc., and consultations with the radiation safety staff or outside consultants.

   c. Modifications to operating and maintenance procedures and to equipment and facilities will be made if they will reduce exposures unless the cost, in our judgment, is considered to be unjustified. We will be able to demonstrate, if necessary, that improvements have been sought, that modifications have been considered, and that they have been implemented when reasonable. If 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 doses 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.

2. Radiation Safety Committee

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 methods of use for which application has been made to ensure 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.

(3) The RSC will ensure that the users justify their procedures and that individual and collective doses will be ALARA.

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 when it is necessary for the RSO to assert authority. If the RSC has overruled the RSO, it will record the basis for its action in the minutes of the 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 in which the investigational levels in Table 1 are exceeded. The principal purpose of this 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 Section 6 below for a discussion of investigational levels).*

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*The NRC has emphasized that the investigational 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 investigations.

Table 1

Investigational Levels

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

*Not normally applicable to medical use operations except those using significant quantities of beta-emitting isotopes.

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

3. Radiation Safety Officer

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 methods of use may be conducted on a more frequent basis.

(2) Quarterly review of occupational exposures. The RSO will review at least quarterly the external radiation doses of authorized users and workers to determine that their doses are ALARA in accordance with the provisions of Section 6 of this program and will prepare a summary report for the RSC.

(3) Quarterly review of records of radiation surveys. The RSO will review radiation surveys in unrestricted and restricted areas to determine that dose rates and amounts of contamination were at ALARA levels during the previous quarter and will prepare a summary report for the RSC.

b. Education Responsibilities for ALARA Program

(1) The RSO will schedule briefings and educational sessions to inform workers of ALARA program efforts.

(2) The RSO will ensure 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.

c. Cooperative Efforts for Development of ALARA Procedures

Radiation workers will be given opportunities to participate in formulating the procedures that they will be required to follow.

(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 will 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, will determine the causes. When the cause is known, the RSO will implement changes in the program to maintain doses ALARA.

4. Authorized Users

a. New Methods of Use Involving Potential Radiation Doses

(1) The authorized user will consult with the RSO and/or RSC during the planning stage before using radioactive materials for new uses.

(2) The authorized user will review each planned use of radioactive materials to ensure that doses will be kept ALARA. Trial runs may be helpful.

b. Authorized User's Responsibility to Supervised Individuals

(1) The authorized user will explain the ALARA concept and the need to maintain exposures ALARA to all supervised individuals.

(2) The authorized user will ensure that supervised individuals who are subject to occupational radiation exposure are trained and educated in good health physics practices and in maintaining exposures ALARA.

5. Individuals Who Receive Occupational Radiation Doses

a. Workers will be instructed in the ALARA concept and its relationship to work procedures and work conditions.

b. Workers will be instructed in recourses available if they feel that ALARA is not being promoted on the job.

6. Establishment of Investigational Levels in Order to Monitor Individual Occupational External Radiation Doses

This institution hereby establishes investigational levels for occupational external radiation doses which, when exceeded, will initiate review or investigation by the RSC and/or the RSO. The investigational levels that we have adopted are listed in Table 1. These levels apply to the exposure of individual workers.

The RSO 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 required by § 20.401 of 10 CFR Part 20. The following actions will be taken at the investigational levels as stated in Table 1:

a. Personnel dose 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 dose is less than Table 1 values for the Investigational Level I.

b. Personnel dose equal to or greater than Investigational Level I but less than Investigational Level II.

The RSO will review the dose of each individual whose quarterly dose equals or exceeds Investigational Level I and will report the results of the reviews at the first RSC meeting following the quarter when the dose was recorded. If the dose 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, review each such dose 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. Personnel dose equal to or greater than Investigational Level II.

The RSO will investigate in a timely manner the causes of all personnel doses equaling or exceeding Investigational Level II and, if warranted, will take action. A report of the investigation, any actions taken, and a copy of the individual's Form NRC-5 or its equivalent will be presented to the RSC at its first meeting following completion of the investigation. The details of these reports will be included in the RSC minutes.

d. Reestablishment of investigational levels to levels above those listed in Table 1.

In cases where a worker's or a group of workers' doses need to exceed an investigational level, a new, higher investigational level may be established for that individual or group on the basis that it is consistent with good ALARA practices. Justification for new investigational levels will be documented.

The RSC will review the justification for and must approve or disapprove all revisions of investigational levels.

7. Signature of Certifying Official*

I hereby certify that this institution has implemented the ALARA Program set forth above.

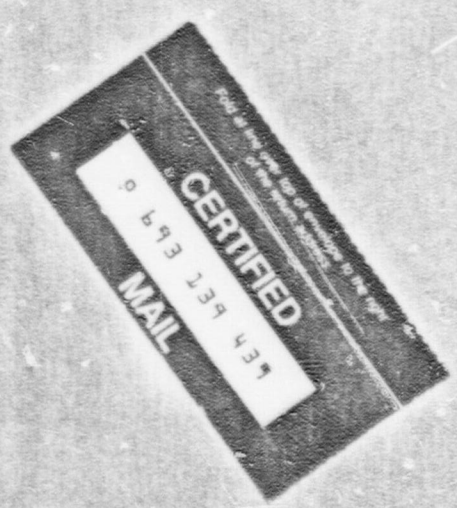
N. Alexander Bowler
Signature

N. ALEXANDER BOWLER
Name (print or type)

Administrator
Title

*The person who is authorized to make commitments for the administration of the institution (e.g., hospital administrator).

Alexander Bowler
Hot Springs County Memorial Hospital
Hot Springs Park
Thermopolis, Wyoming 82443



RETURN RECEIPT
REQUESTED

U. S. Nuclear Regulatory Commission, Region IV
Material Radiation Protection Section
611 Ryan Plaza Drive, Suite 1000

Arlington, Texas 76011