

November 2, 2020

Laura B. Cender
U. S. Nuclear Regulatory Commission
Materials Licensing Section
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Control Number 618921

Ms. Cender:

Please allow this letter to serve as a response to your request made on October 13, 2020 for additional information in support of the license renewal for Indiana University Health Bloomington Hospital Byproduct Materials License, Number 13-10408-02. The use of low dose rate brachytherapy sources as authorized by 10 CFR 35.400 was limited to Pd-103 and I-125. The Cs-131 sources authorized by our license were never received or utilized at our facility. The final possession of sources authorized by 10 CFR 35.400 occurred on April 21, 2017. A decay-in-storage survey was made of the sources, incident to their disposal. We are no longer able to locate the disposal records. The area of use that served as storage for the seeds at our facility was removed from the license with a request made in June 2017. At the time of the request, we were no longer in possession of any sources licensed under 10 CFR 35.400 and have not received any since. We currently do not possess any sources licensed under 10 CFR 35.400.

If there are any questions concerning this license amendment, please contact the Indiana University Health Bloomington Hospital Radiation Safety Officer, Mr. Patrick J. Byrne, DABR, CHP, DABSNM at 877-317-5811.

Sincerely,



Patrick J. Byrne, DABR, CHP, DABSNM
Radiation Safety Officer

From: pbyrne@mpcphysics.com
To: [Cender, Laura](#)
Cc: ["Riley, Bruce L"](#)
Subject: [External_Sender] RE: Additional information
Date: Monday, November 02, 2020 8:35:36 PM
Attachments: [ResponseToNRC110220.pdf](#)

Laura,

Attached is a revised response letter. Please consider this instead of our original letter from October 20th.

I have asked the current medical physicist if he could locate the decay in storage records and he was not able to. I went back through my emails and found an email from the previous medical physicist, dated 6/21/17. I had emailed him in preparation of putting together the request to remove the storage area from the license where the seeds were kept and I wanted to make sure we no longer possessed any sources. In his email, he stated that the last seed disposal survey was performed on 4/21/17. I have added this date and the fact that we cannot locate the actual record any longer to the response letter.

If you have any additional questions, please let me know.

Thanks,
patrick

From: Cender, Laura <Laura.Cender@nrc.gov>
Sent: Monday, November 2, 2020 10:40 AM
To: pbyrne@mpcphysics.com
Cc: Riley, Bruce L <BRiley1@iuhealth.org>
Subject: RE: Additional information

Hello Patrick,

Thank you for reaching out to me on Friday afternoon to provide some context regarding the I sent email below. I have taken a closer look at our inspection records and it appears that the last use of 10 CFR 35.400 materials that we have record of took place in January, 2015, as documented in the attached inspection record from 2016.

Additionally, the June, 2017 amendment request to close out an area of use stated the following: "At the time of the close-out survey, no radioactive materials were present. Prior to the survey, unused sealed Pd-103 and I-125 sources were decayed in storage, surveyed to verify they were at background radiation levels, and then disposed of. The final disposal of sources occurred on 4/21/17."

I understand due to the circumstances with the sudden loss of the medical physicist who was present at the time that there may be challenges in identifying past records, but the letter submitted stating that August 8, 2011 was the last date of material use does appear to be in conflict with our

records. Please review the accuracy of the letter dated October 20, 2020 and resubmit to me directly as needed. As we discussed, the regulatory requirement for decay-in-storage records to be maintained is 3 years so the retention period has passed, based off of the previously submitted April 21, 2017 date, and you are not required to submit those disposal records if you cannot locate them.

Please let me know if you have any questions.

Thank you,
Laura

From: Cender, Laura
Sent: Friday, October 30, 2020 10:30 AM
To: Riley, Bruce L <BRiley1@iuhealth.org>
Cc: pbyrne@mpcphysics.com
Subject: RE: Additional information

Hello Bruce,

Thank you for your help in putting this response together. I noted from the letter and from our records of the referenced June 19, 2017 amendment request that final disposal of sealed sources occurred on April 21, 2017. Do you know if you have any retained records pertaining to this final disposition?

Thank you,
Laura

Laura Cender
U.S. Nuclear Regulatory Commission
Materials Licensing Branch
E-mail: Laura.Cender@nrc.gov
Phone: (630) 829-9712

From: Riley, Bruce L <BRiley1@iuhealth.org>
Sent: Thursday, October 29, 2020 1:35 PM
To: Cender, Laura <Laura.Cender@nrc.gov>
Subject: [External_Sender] Additional information

Additional information you had asked for.

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