THE GEORGE WASHINGTON UNIVERSITY HOSPITAL

May 13, 2021

U.S. Nuclear Regulatory Commission, Region 1
Medical and Licensing Assistance Branch
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406

RE: Reply to Renewal Application dated March 3, 2021 (Mail Control No. 624964)
District Hospital Partners, L.P. d/b/a The George Washington University Hospital
License: 08-30607-01

Dear Mr. Gallaghar

In reply to your request for additional information regarding the license renewal application for the above-cited license that was submitted on March 3, 2021, please review the following responses to your listed items, Items 1-2, so that you may be able to continue your review:

Item 1. *You have requested The Ambulatory Surgical Center (basement), 2120 L Street, N.W., Washington, D.C. be removed as a use location from your license. Please submit documentation of the historical use of licensed materials in the Ambulatory Surgical Center and the radiological assessment confirming no residual contamination remains, or provide a justification why such assessment is not necessary (i.e. no licensed materials were used in the facility) to release the areas from unrestricted use.*

Response: The Ambulatory Surgery Center located in the basement of 2120 L Street, N.W. was previously used for brachytherapy treatments. Treatments were restricted to the use of I-125 only in the form of sealed sources (seeds). Seeds were placed in patients for treatment in any of the five operating rooms in the surgery center. Patients were transferred post-op to a recovery area before being discharged from the use location. The brachytherapy program ceased performing treatments prior to 2013. No incidents of lost or transected seeds are on record under this program. Per routine quality assurance checks performed by Radiation Oncology under the brachytherapy program, sources were meticulously accounted for before, during and after treatments. An area closeout survey was performed for this use location on May 12, 2021 and a report of this survey is enclosed. This report indicates that no residual contamination remains, and exposure readings are at background levels. This use area has been deemed suitable to be released for unrestricted use.

Item 2. *You have requested Tc-99m and Co-57 in "any form" for use in shielding determinations. While Tc-99m can be approved, the Co-57 is primarily utilized as a sealed source for such uses. Please confirm what form Co-57 you with to use. If you still wish to use Co-57 in "any form", please describe additional measures you will implement to handle unsealed Co-57*

Response: Please accept this as written confirmation that we wish to use Co-57 in sealed source form (e.g. Nuclear Medicine quality control sheet source) only for use in shielding determinations. We do not wish to use Co-57 in any other forms for shielding determinations.

Please do not hesitate to request additional information from Sarah Mills at Sarah.Mills@gwu-hospital.com, should you require further assistance in reviewing our license renewal application.

Sincerely,

Digitally signed by Arnold Able
Date: 2021.05.14 12:21:11 -04'00'

Arnold Able, MS, DABR
Radiation Safety Officer
The George Washington University Hospital

Enclosures:
Area Closeout Survey Report (Ambulatory Surgery Center)

Aspekt Solutions

7501 Greenway Center Drive
Suite 1001
Greenbelt, MD 20770
301.220.3580 Phone

Area Closeout Survey Report

George Washington University Hospital
Ambulatory Surgery Center (Basement)
2021 L Street, NW
Washington, DC 20037

RAM License: NRC 08-30607-01

Date of Survey: May 12, 2021
Date of Report: May 13, 2021

Introduction

An area closeout survey was conducted on the above-cited date. The purpose of the survey was to demonstrate that all radioactive material had been removed from the above-cited use location and that no residual radioactive material remained. This location was previously used by Radiation Oncology for patient brachytherapy treatments. Licensed radioactive material used under this program was restricted to I-125 seeds as sealed sources only. No other licensed radioactive material was used historically at this authorized use location and no patient treatments under the brachytherapy program have occurred since before 2013. This survey is intended to comply with the regulatory requirements and license conditions as issued by the U.S. Nuclear Regulatory Commission (NRC).

Methods

Area Survey: The closeout location in the facility where radioactive material was known to have been stored, prepared, or used was systematically inspected using a NaI survey meter. The survey meter probe was slowly scanned across all countertops, patient beds, cabinet shelves, drawers, doors, and floors. The response of the meter was observed and recorded.

Wipe Survey: A survey for any residual removable contamination in the facility was also conducted. Wipe tests covering large surface areas of at least 300 cm^2 using paper swabs were taken in all closeout locations where radioactive material was stored, prepared, or used. Each wipe sample was individually counted in a well counter using a 1-minute count time.

Aspekt Solutions

7501 Greenway Center Drive
Suite 1001
Greenbelt, MD 20770
301.220.3580 Phone

Instrumentation

The following survey meter and gamma counter were used. The wiper has a pre-set efficiency of 82.4% for I-125.

1. Ludlum 16 (sn 154576) with 44-3 probe (sn 169137), calibrated 11/10/2020
2. LTI Mutli-Wiper (sn W0150206).

Facility

The Ambulatory Surgery Center encompasses the basement floor of the above-cited address. The areas where radioactive material was used consisted of 5 operating rooms and a patient recovery area. A floor plan of the facility is included at the end of this report in Figure 1.

Results

TABLE 1 – Closeout Survey Results

Location	NaI Exposure Rate (cpm)	Wipe Test Results (net cpm)	Wipe Test Results (µCi)
Background	150	24	-
OR 1	≤ background	0	< 0.005
OR 2	≤ background	0	< 0.005
OR 3	≤ background	0	< 0.005
OR 4	≤ background	0	< 0.005
OR 5	≤ background	0	< 0.005
Corridor	≤ background	0	< 0.005
Recovery	≤ background	0	< 0.005

Summary

1. A visual inspection of the surgery center indicated that all known radioactive sources have been removed from the facility.
2. A calibrated survey meter was used to survey all locations in the facility where radioactive material was known to have been stored, prepared, or used. The survey results indicated no detectable radioactive material remains.
3. Wipe tests for removable contamination were taken in all locations in the facility where radioactive material was known to have been stored, prepared, or used. The wipe test results indicated no removable contamination remains.

7501 Greenway Center Drive
Suite 1001
Greenbelt, MD 20770
301.220.3580 Phone

4. The facility was found to be free of all radioactive material and removable contamination.

As a result of this closeout survey, which indicated that there are no radioactive sources or contamination from radioactive material present, the Ambulatory Surgery Center at the above-cited address should be released for unrestricted use from the above-cited radioactive materials license. This report should be forwarded to the Nuclear Regulatory Commission. If you should have any questions regarding the results of this survey, please contact the undersigned.

Report Prepared by: Sarah J. Mills Digitally signed by Sarah J. Mills Date: 2021.05.14 08:28:17 -04'00'

Sarah J. Mills, M.S.
Diagnostic Physicist

Report Reviewed by: Digitally signed by Arnold Able Date: 2021.05.14 12:36:01 -04'00'

Arnold Able, MS, DABR
Radiation Safety Officer

7501 Greenway Center Drive
Suite 1001
Greenbelt, MD 20770
301.220.3580 Phone

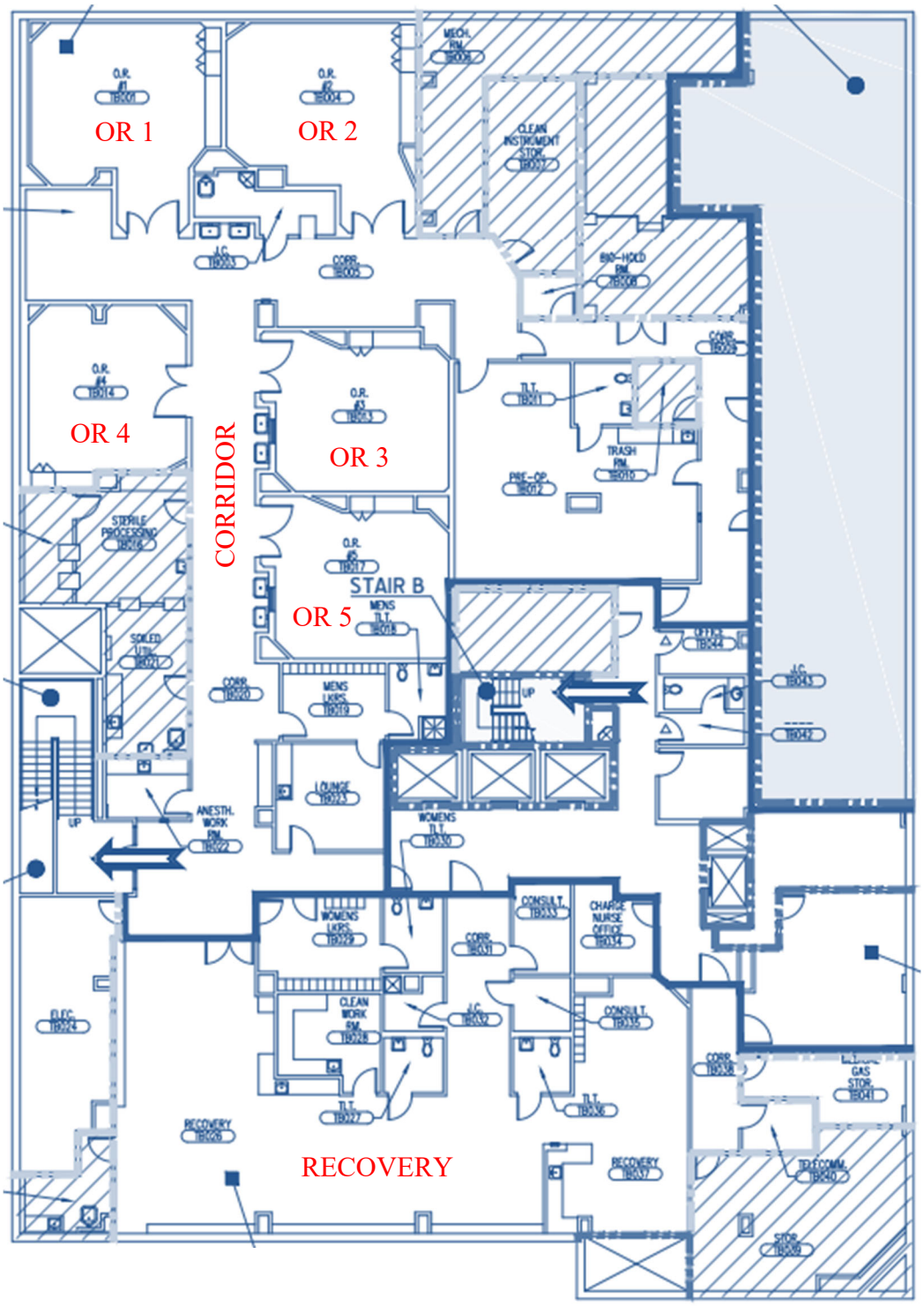

Figure 1 – Ambulatory Surgery Center (basement)
2021 L Street, NW
Washington, DC 20037