

Ujagar S. Bhachu, PEng., CEng., Mechanical Engineer
Materials Safety and Inspection Branch,
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Office of Nuclear Material Safety And Safeguards.

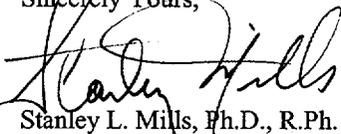
12 November, 1999

Dear Mr. Bhachu,

Pursuant to our telephone conversation of this date the following information is submitted regarding our manufacturing of brachytherapy sources under 10 CFR 32.74.

1. I have reviewed our manufacturing, storage, and handling procedures per your request and believe in normal use and disposal of a single unit, it is unlikely that the external radiation dose in any one year, or the dose commitment resulting from the intake of radioactive material in any one year, to a suitable sample of the group of individuals expected to be most highly exposed to radiation or radioactive material from the product will exceed the dose as specified in 10 CFR 20.1201 "Occupational dose limits for adults", and 10 CFR 20.1301 "Dose limits for individual members of the public".
2. In normal handling and storage of the quantities of units likely to accumulate in our location during marketing, distribution, installation, and servicing of the product, it is unlikely that the external radiation dose in any one year, or the dose commitment resulting from the intake of radioactive material in any one year, to a suitable sample of the group of individuals expected to be most highly exposed to radiation or radioactive material from the product will exceed the dose as specified in 10 CFR 20.1201 "Occupational dose limits for adults", and 10 CFR 20.1301 "Dose limits for individual members of the public".
3. It is unlikely that there will be a significant reduction in the effectiveness of the containment, shielding, or other safety features of the product from wear and abuse likely to occur in normal handling and use of the product during its useful life.
4. In use and disposal of a single unit, or in handling and storage of the quantities of units likely to accumulate in our location during marketing, distribution, installation, and servicing of the product, the probability is low that the containment, shielding, or other safety features of the product would fail under such circumstances that a person would receive an external radiation dose or dose commitment in excess of the dose as specified in 10 CFR 20.1201 "Occupational dose limits for adults", and 10 CFR 20.1301 "Dose limits for individual members of the public".

Sincerely Yours,

A handwritten signature in cursive script that reads "Stanley L. Mills".

Stanley L. Mills, Ph.D., R.Ph.
President and CEO
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