Sibley Memorial Hospital 5255 Loughboro Road, N.W. Washington, D.C. 20016-2695 202-537-4000 T



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February 3, 2012 Imaging Department Sibley Memorial Hospital 5255 Loughboro Rd. NW Washington, D.C. 20016

Janice E. Nguyen Licensing Assistant Section Nuclear Materials Safety Branch U.S. Nuclear Regulatory Commission Region 1 475 Allendale Road King of Prussia, PA 19406-1415

RE: Licensed Amendment Request Sibley Memorial Hospital NRC-08-07398-03

03014754

Mrs. Nguyen:

Please amend the above reference license to delete Mark Wolfman, M.D. as an Authorized User of byproduct materials permitted by 10CFR 35.100, 35.200 and 35.300. In addition, please add Dr. Bryan DeFranco as an Authorized User of byproduct materials permitted by 10CFR 35.100, 35.200 and 35.300. Dr. DeFranco's medical license, NRC form 313A, and his Maryland radioactive materials license are enclosed. Also, please delete Youssef Charara, Ph.D. as an Authorized Medical Physicist.

Please see attached item #5 request for addition of I-125 brachytherapy sources.

If there are any questions or additional information is needed, please contact Jordie Keck, RSO at 202-243-5165 or Michelle Loscocco, Health Physics Consultant, Krueger-Gilbert Health Physics, Inc. at (410) 692-9806

Sincerely,

Johr L Sl.

Robert L. Sloan, President and C.E.O.

576913 NMSS/RGN1 MATERIALS-002





RE: Licensed Amendment Request Sibley Memorial Hospital NRC-08-07398-03 Page 2

ITEM # 5 Radioactive Material Request

Byproduct material permitted by 10 CFR 35.400	Sealed Sources (Isoaid Advantage I-125 Model IAI-125A interstitial seeds for eye plaques)	5 curies
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NRC FORM (1-2012) 10 CFR 30, 32, 3		S. NUCLEAR REGI	ULATORY COMMIS	Estimate	VED BY OMB: NO. 3150-0120 d burden per response to comply with this mandatory		
34, 35, 36, 39, ar	nd 40				the application is necessary to determine that the applicant is qualified and that adequate process to protect the public health and safety. Send comments regarding burden estimate to the 1 Sensines Respect (F 563) U.S. Nuclears Resultance Complexing the Application DC 20555 0001		
APPLICATION FOR MATERIALS LICENSE			SE internet Regulato 20503. If number,	Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Informa Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washing 20503. If a means used to impose an information collection does not display a currently valid OM number, the NRC may not conduct or sponsor, and a person is not required to respond to, the info collection.			
					R DETAILED INSTRUCTIONS FOR C C OFFICE SPECIFIED BELOW.	COMPLETING APPLICA	
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Dosimetry Parameters

The dosimetric characteristics of IsoAid ADVANTAGE[™] (model IAI-125A) I-125 source have been determined according to the Updated AAPM Task Group 43 (TG43U1) recommendations¹. The values presented here are based on AAPMapproved consensus datasets².

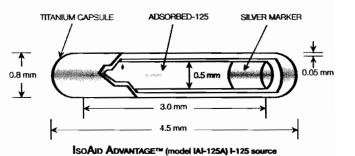
Consensus dose rate constant value²

Dose Rate Constant con 0.981 cGy/h/U

AAPM Consensus line source approximation radial dose function $(g_L(r))$ and point source approximation radial dose function $(g_P(r))^2$

Distance	Radial Do	se Function
(cm)	gr(L)	gp(r)
0.0	1.040	0.686
0.10	1.040	0.686
0.15	1.053	0.833
0.25	1.066	0.967
0.50	1.080	1.056
0.75	1.035	1.029
1.00	1.000	1.000
1.50	0.902	0.906
2.00	0.800 ·	0.804
3.00	0.611	0.615
4.00	0.468	0.471
5.00	0.368	0.371
6.00	0.294	0.296
7.00	0.227	0.229
8.00	0.165	0.166
9.00	0.141	0.142
10.00	0.090	0.091

NOTE: g(r) at 0.0cm equals $g(r_{min})$ as recommended by AAPM Task Group No. 43U1 Report



AAPM consensus 2D and 1D Anisotropy Functions²

Angle θ		2D	Anisotı	opy Fu	nction,	F(r,θ)
(Degree)	0.5cm	1.0cm	2.0cm	3.0cm	5.0cm	7.0cm
0	0.352	0.406	0.493	0.520	0.578	0.612
5	0.411	0.465	0.545	0.584	0.658	0.701
10	0.481	0.527	0.601	0.642	0.704	0.726
20	0.699	0.719	0.757	0.775	0.794	0.799
30	0.848	0.846	0.862	0.862	0.869	0.879
40	0.948	0.936	0.932	0.916	0.937	0.969
50	1.002	0.986	0.974	0.961	0.963	0.971
60	1.029	1.024	1.008	0.993	0.990	1.001
70	1.029	1.039	1.027	1.006	1.016	1.010
80	0.999	1.025	1.024	1.023	1.009	1.025
90	1.000	1.000	1.000	1.000	1.000	1.000
φ _{an} (r)	0.957	0.968	0.964	0.955	0.959	0.955

Polynomial Equation

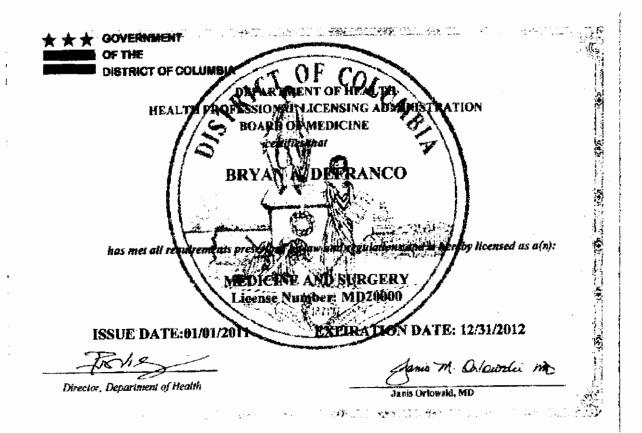
ç	Jr($r = a_0 + a_1r + a^2r^2 + a_1r + a_2r^2 + a_2r$	a₃r	$^{3} + a_{4}r^{4} + a_{5}r^{5}$
		Where:		
a₀	=	1.0549E+0	aı	= 5.8111E-2
a_2	=	-1.5048E-1	a₃	= 3.7413E-2
a4	=	-3.7008E-3	a₅	= 1.3103E-4

References

1. M.J. Rivard, B.M. Coursey, L.A. DeWerd, W.F. Hanson, M.S. Huq, G.S. Ibbott, M.G. Mitch, R. Nath, J.F. Williamson, "Update of AAPM Task Group No. 43 Report: A revised AAPM protocol for brachy-therapy dose calculations," Med Phys. 31(3) (2004) 633-674.

2. M.J. Rivard, W.M. Buttler, L.A. DeWerd, M.S. Huq, G.S. Ibbott, A.S. Meigooni, C.S. Melhu s, M.G. Mitch, R. Nath, J.F. Williamson. "Supplement to the 2004 update of the AAPM Task Group No. 43 Report," Med. Phys. 34(6) 2187-2205.

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SUBURBAN HOSPITAL

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NRC FORM 313A	(AUT)	U.S. NUC	EAR REGULATORY	COMMISSION	an a
•		PTOR ATTEST/ fined under 35.	ATION .300}		APPROVED BY OMB: NO. 3160-01; EXPIRES: 3/31/2012
Name of Propo	ed Authorized User		State or Territory	Where Licans	ed
Bryan Anthony	DeFranco, M.D.		Maryland		
Requested Au	horization(s) (check all th	hat apply):			
35.200	Use of unsealed byprod	duct material for wh	ich a written direc	tive is requin	ad
OR					
	Oral administration of s 1.22 gigabecquerels (3		requiring a writter	n directive in t	quantities less than or equal to
<u>×x</u>] 35.300	Oral administration of s glgabecquerels (33 mill	odium iodide i-131 icuries)	requiring a writter	n directive in (quantities greater than 1.22
35.300	Parenteral administration than 150 keV for which	on of any bela-emiti a written directive i	er, or photon-emi s required	tting radionu	lide with a photon energy less
35.300	Parenteral administration	on of any other radi	onuclide for which	n a written dir	ective is required
	s checked above. Certification				
a. Provid	s a copy of the board cer	lification.			
b. For 35 be use	.390, provide documental d to document this experi	tion on supervised o ience.	dinical case expe	rience. The l	able in section 3.c. may
and su	.396, provide documental pervised clinical case exp ent this experience.	tion on classroom a perience. The table	nd leboratory trains in sections 3.a.,	ning, supervis , 3.b., and 3.c	ed work experience, a may be used to
	and complete Part II Pre	ceptor Attestation.			
d. Skip to	t 35.300, 35.400, or 35.6 ted User on Materials Lic				
2. <u>Curren</u>	and the second s			unde	r the requirements below or
2. <u>Curren</u> a. Authori	ent Agreement State regi	uirements (chack el	l mat annivi		
2. <u>Curren</u> a. Authori equiva	ent Agreement State regi 390	_	-	32 00	•
2. <u>Curren</u> a. Authori equival 35. b. if curre reguire		35.394 et of clinical uses u ence. The table in i	35.490 nder 36.300, prov	ide documen vide used to do	tation on additional

.

AUTHORIZED USER TRAININ	NG AND EXPERIEN	ICE AND PREVER	URALIES.	(110) 100-	11114947
Training and Experience for P	roposed Authorize	d User 35.392	35.394		35.396
a. Classroom and Laboratory Train	Ining 35.390	00.004		Clock	Dates of
Description of Training	Locati	Ion of Training		Hours	Training*
Rediation physics and instrumentation					
Rediation protection					
Mathematics pertaining to the use and measurement of radioactivity	1				
Chemistry of byproduct material for medical use		anna a line a line anna an a			1
Radiation biology					
	Total Hours of Trai	ning:			and an approximate state of the part of the
If more then one supervising in of this page. Supervised Work Experience	Idividual is necessar		Hours of	, proviue	Ulliple copies
Description of Experience Must Include:	Location of F Permit 1	Experience/License Number of Facility	e or	Confirm	Dates of Experience
Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation surveys				Yes No	
Performing quality control procedures on instruments used to determine the activity of dosages and performing checks for proper operation of survey meters				Yes No	
Celculating, measuring, and safely preparing patient or human research subject dosages	anna a su V Massann su na gada anna anna anna anna anna anna a			Yes No	
Using administrative controls to prevent a medical event involving the use of unsealed byproduct material				Yes No	
by product material	, Sandag Balanta, and an and an and a fight and and an and a set of the set o	The second s	[Yes	

(Lial radionuciides)

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; FORM 313A (AUT) m		U.S. NUCLEAR REGULA	
		ENCE AND PRECEPTOR ATTESTATION (co	ontinued)
Training and Experience fo		<u>i User</u> (continuea)	
b. Supervised Work Experier	nce (continued)		
Supervising Individual		License/Permit Number listing supervising ind authorized user	lividual as an
Supervising individual meets apply)**:	the requirements below	v, cr equivalent Agreement State requirements	check all that
35.390 With experience	e administering dosage	es of:	•••••
oinsheedu	31 requiring a written di ereis (33 millicuries)	rective in quantities less than or equal to 1.22	
35.394	• •	than 1.22 glgabecquerels (33 millicuries)	
36.396 Parenteral	administration of beta-	emitter, or photon-emitting redionuclide with a	photon
energy less	s than 150 keV requiring	g a written directive is required	and the form
Paranteral	administration of any o	ther radionuclide requiring a written directive	
** Supervising Authorized User mus	si have experience in adminis	tering dosages in the same cosage category or categorie	e as the individua
requesting authorized user status	B.		
c. Supervised Clinical Case E if more than one supervisi multiple copies of this page	ng individual is necessa	ary to document supervised work experience, j	provide
If more than one supervisi	ng individual is necessa	ary to document supervised work experience, j Location of Experience/License or Permit Number of Facility	provide Dates of Experience
If more than one supervisi multiple copies of this page	ng individual is necesse e. Number of Cases Involving Personal Participation 3 cases	Location of Experience/License or Permit	Dates of
If more than one supervision multiple copies of this page Description of Experience Oral administration of sodium iodide I-131 requiring a writter directive in quantities less that or equal to 1.22 gloabecourse	ng individual is necesse e. Number of Cases Involving Personal Participation 3 cases 1 3 cases	Location of Experience/License or Permit Number of Facility	Dates of Experience August 2008 -
If more than one supervisit multiple copies of this page Description of Experience Oral administration of sodium iodide I-131 requiring a writter directive in quantities less that or equal to 1.22 gigabecquere (33 millicuries) Oral administration of sodium iodide I-131 requiring a written directive in quantities greater than 1.22 gigabecquerels (33	ng individual is necessa Number of Cases Involving Personal Participation 3 cases 1 3 cases	Location of Experience/License or Permit Number of Facility Suburban Hospital / MD-31-002-01	Dates of Experience August 2008 - June 2011 August 2008 -

PAGE 3

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NRC FORM 313A ((3-2009)	· · ·	U.S. NUCLEAR REGULATORY COMMISS
AUTH	ORIZED USER TRAINING AN	ID EXPERIENCE AND PRECEPTOR ATTESTATION (continued)
		Authorized User (continued)
	ised Clinical Case Experience	
Supervising	Individual	License/Permit Number listing supervising individual as an authorized user
Mark G. W	olfman, M.D.	MD-31-602-01
Supervisin epply)**:	g individual meets the require	nents below, or equivalent Agreement State requirements (check all that
√ 35.390	With experience administe	ring dosages of.
 ✓ 35.392 ✓ 35.394 	Oral Nal-131 requiring	a written directive in quantities less than or equal to 1.22 licurles)
<u>₹</u> 35.394 <u>₹</u> 35.396	✓ Oral Nal-131 in quanti	ties greater than 1.22 glgabecquerels (33 millicuries) ion of beta-emitter, or photon-emitting radionuclide with a photon eV requiring a written directive is required
		ion of any other radionucilde requiring a written directive
At Superview		ince in administering dosages in the same dosage category or categories as the individual
d. Provide		Itestation.
d. Provide Note: This par individu	completed Part II Preceptor A PART 1 must be completed by the in al as long as the preceptor pro	ttestation. "II - PRECEPTOR ATTESTATION dividual's preceptor. The preceptor does not have to be the supervising vides, directs, or verifies training and experience required. If more than
d. Provide Note: This par individur one pre By checi	completed Part II Preceptor A PART t must be completed by the in al as long as the preceptor pro ceptor is necessary to docume king the boxes below, the prece	Itestation.
d. Provide Note: This par individu one pres By cheol position First Section Check one of th	completed Part II Preceptor A PART t must be completed by the in al as long as the preceptor pro ceptor is necessary to docume king the boxes below, the prec sought and not attesting to the	ttestation. "II - PRECEPTOR ATTESTATION dividual's preceptor. The preceptor does not have to be the supervising vides, directs, or verifies training and experience required. If more than ent experience, obtain a separate preceptor statement from each. reptor is attesting that the individual has knowledge to fulfill the duties of to individual's "general clinical competency."
d. Provide Note: This par individur one pres By check position	completed Part II Preceptor A PART t must be completed by the in al as long as the preceptor pro ceptor is necessary to docume king the boxes below, the prec sought and not attesting to the	ttestation. "II - PRECEPTOR ATTESTATION dividual's preceptor. The preceptor does not have to be the supervising vides, directs, or verifies training and experience required. If more than ent experience, obtain a separate preceptor statement from each. reptor is attesting that the individual has knowledge to fulfill the duties of to individual's "general clinical competency."
d. Provide Note: This par individua one pres By cheol position First Section Check one of the <u>For 35,390</u>	completed Part II Preceptor A PART t must be completed by the in al as long as the preceptor pro ceptor is necessary to docume king the boxes below, the prec sought and not attesting to the	ttestation. "II - PRECEPTOR ATTESTATION dividual's preceptor. The preceptor does not have to be the supervising vides, directs, or verifies training and experience required. If more than ent experience, obtain a separate preceptor statement from each. reptor is attesting that the individual has knowledge to fulfill the duties of to individual's "general clinical competency."
d. Provide Note: This par individua one pres By check position First Section Check one of the <u>For 35,390;</u> Board C	completed Part II Preceptor A PART t must be completed by the in al as long as the preceptor pro ceptor is necessary to docume king the boxes below, the prec sought and not attesting to the ne following for each reques	II - PRECEPTOR ATTESTATION dividual's preceptor. The preceptor does not have to be the supervising vides, directs, or verifies training and experience required. If more than ent experience, obtain a separate preceptor statement from each. reptor is altesting that the individual has knowledge to fulfill the duties of the individual's "general clinical competency." ted authorization: set has satisfactorily completed the training and experience
d. Provide Note: This par individua one pred By check position First Section Check one of the <u>For 35.390;</u> <u>Board C</u>]√] (atte	completed Part II Preceptor A PART t must be completed by the in al as long as the preceptor pro ceptor is necessary to docume king the boxes below, the prec sought and not attesting to the sought a	II - PRECEPTOR ATTESTATION dividual's preceptor. The preceptor does not have to be the supervising vides, directs, or verifies training and experience required. If more than ent experience, obtain a separate preceptor statement from each. reptor is altesting that the individual has knowledge to fulfill the duties of the individual's "general clinical competency." ted authorization: set has satisfactorily completed the training and experience
d. Provide Note: This par individua one pre By checi position First Section Check one of th <u>For 35,390;</u> <u>Board C</u> j√] (atte requi	completed Part II Preceptor A PART timust be completed by the in all as long as the preceptor pro ceptor is necessary to docume king the boxes below, the prec sought and not attesting to the sought and not attesting to the refollowing for each request the following for each request the following	II - PRECEPTOR ATTESTATION dividual's preceptor. The preceptor does not have to be the supervising vides, directs, or verifies training and experience required. If more than ent experience, obtain a separate preceptor statement from each. reptor is altesting that the individual has knowledge to fulfill the duties of the individual's "general clinical competency." ted authorization: set has satisfactorily completed the training and experience
d. Provide Note: This par individua one pres By check position First Section Chack one of th <u>For 35.390;</u> <u>Board C</u> []] f atte requi	completed Part II Preceptor A PART t must be completed by the in al as long as the preceptor pro ceptor is necessary to docume king the boxes below, the prec sought and not attesting to the ne following for each request ertification st lhat Bryan Anthony DeFran Nems of Proposed A	Itestation. II - PRECEPTOR ATTESTATION dividual's preceptor. The preceptor does not have to be the supervising vides, directs, or verifies training and experience required. If more than ent experience, obtain a separate preceptor statement from each. reptor is attesting that the individual has knowledge to fulfill the duties of the individual's "general clinical competency." ted authorization: has satisfactorily completed the training and experience uthorized User

NRC FORM 313A (AUT) (3-2009)		U.S. NUCL	EAR REGULATORY COMMI
	D USER TRAINING AND EXI	PERIENCE AND PRECEPTOR ATTES	TATION (continued)
Precentor Atlestation			
First Section (con	linued)		
For 35.392 (Identi	cal Atlestation Statement Re	egardless of Training and Experience	Pathway):
🗹 I attest that	Bryan Anthony DeFranco Nante of Proposed Authorized	has satisfactorily completed t	te 80 hours of classroor
	ry training, as required by 10 equired in 35.392(c)(2).	CFR 36.392(c)(1), and the supervised w	ork and clinical case
For 35,394 (identi-	cal Attestation Statement Re	egardiess of Training and Experience	Pathwav):
✓ I attest that	Bryan Anthony DeFranco Name of Proposed Authorized (has satisfactorily completed th	ne 80 hours of classroo
and laborato experience n	ry training, as required by 10 (equired in 35.394(c)(2).	CFR 35.394 (c)(1), and the supervised v	vork and clinical case
Second Section			
🖌 I allest that	Bryan Anthony DeFranco Name of Proposed Authorized L	has satisfactorily completed th	ne required clinical case
experience re	equired in 35.390(b)(1)(ii)G lis	ted below:	
XX Oral Nal- gigabecq	131 requiring a written directiv uerels (33 milliouries)	e in quantities less than or equal to 1.22	2
XX Oral Nat-	131 in quantities greater than	1.22 glgabecquerels (33 millicurles)	
Parentera		ar, or photon-emitting radionuclide with a	a photon
Parentera	I administration of any other r	adionuclide requiring a written directive	
*******	*******		********
Third Section			
✓ I attest that	Bryan Anthony DeFranco Name of Proposed Authorized U	has satisfactorily achieved a le	vel of competency to
function indep	endenily as an authorized us	er for;	
oral Nal-1 gigabecgu	31 requiring a written directive erels (33 millicuries)	e in quantilies less than or equal to 1.22	
XX Oral Nal-1	31 in quantities greater than 1	i.22 gigabecquerels (33 millicuries)	
Parenteral		or photopermitting redicqualida with a	photon

NRC FORM 313A (AUT)			U.S. NUCLEAR REGUL	ATORY COMMISSIC
		ING AND EXPER	ENCE AND PRECEPTOR ATTESTATION (entinuad)
Fourth Section				
For 35,398;				
Current 35.4	90 or 35.690 autho	orized user:		
I attest th	at		is an authorized user under 10 CFR 35.	490 or 35.690
م السنية ال	Name of Pr	oposed Authorized User		
laboratory experience	/ training, as requir	ed by 10 CFR 35. 96(d)(2), and has	has satisfactority completed the 80 hours of cle 396 (d)(1), and the supervised work and clinics achieved a level of competency sufficient to tu	ai case
Paren than 1	teral administration 50 keV for which a	of any beta-emitt written directive is	er, or photon-emitting radionucilde with a phot s required	ion energy less
Paren	teral administration	of any other radic	onucide for which a written directive is require	d
			OR	
Board Certif	ication:			
🗌 I attest ih		opcaed Authorized User	has satisfactorily completed the board c	ertification
Paren than 1	50 KeV for which a	written directive is	petency sufficient to function independently at er, or photon-emitting radionuclide with a phot s required muclide for which a written directive is required	ion energy less
Paren than 1	leral administration 50 keV for which a teral adminstration	written directive is of any other radio	er, or photon-emitting radionuclide with a phot s required enuclide for which a written directive is required	ion energy less
Paren than 1 Peren Fifth Section Complete the folio	leral administration 50 keV for which a teral administration wing for precepto	written directive is of any other radio r attestation and	er, or photon-emitting radionuclide with a phot s required enuclide for which a written directive is required	ion energy less
Paren than 1 Peren Fifth Section Complete the folio	leral administration 50 keV for which a teral administration wing for precepto	written directive is of any other radio r attestation and	er, or photon-emitting radionuclide with a phot s required enuclide for which a written directive is required signature:	ion energy less
Paren than 1 Peren Fifth Section Complete the folio () I meet the re () 35.390	leral administration 50 keV for which a teral administration wing for precepto quirements below, 2 35.392 ence administering	written directive is of any other radio r attestation and or equivalent Agre 25.394	er, or photon-emitting radionuclide with a photon required nuclide for which a written directive is required signature:	lon energy less d user for:
☐ Paren than 1 ☐ Peren Fifth Section Complete the folio [] I meet the re [] 36.390 [] have experi requesting at	leral administration 50 keV for which a teral administration wing for precepto quirements below, 2 35.392 ence administering uthorization.	written directive is of any other radio r attestation and or equivalent Agre 2 35.394 dosages in the fo	er, or photon-emitting radionuclide with a phot s required enuclide for which a written directive is required signature: element State requirements, as an authorized in [7] 35,396	lon energy less d user for: thorized User is
Paren than 1 Peren Fifth Section Complete the follo I meet the re I as 35.390 I have experi requesting at requesting at I Oral Nal- millicuries	leral administration 50 keV for which a teral administration wing for precepto quirements below, 2 35.392 ence administering uthorization. 131 requiring a write)	written directive is of any other radio r attestation and or equivalent Agre [] 35.394 dosages in the fo ten directive in qui	er, or photon-emitting radionuclide with a phot s required muclide for which a written directive is required signature: eement State requirements, as an authorized [2] 35.396	lon energy less d user for: thorized User is
Paren than 1 Peren Fifth Section Complete the folio () I meet the re () 35.390 () I have experi requesting at () Oral Nal-1 () Oral Nal-1 () Parentera	leral administration 50 keV for which a teral administration wing for precepto quirements below, 2 35.392 ence administering uthorization. 131 requiring a write)	written directive is of any other radio r attestation and or equivalent Agre [] 35.394 dosages in the fo ten directive in qui eater then 1.22 gip beta-emitter, or ph	er, or photon-emitting radionuclide with a phot s required enuclide for which a written directive is required signature: eement State requirements, as an authorized [2] 35.396 Nowing categories for which the proposed Aut antities less than or equal to 1.22 gigabecquer gabecquerels (33 millicuries)	lon energy less d user for: thorized User is rels (33
□ Paren than 1 □ Paren □ Parentera □ Parentera 160 keV m	leral administration 50 keV for which a teral administration wing for precepto quirements below, 2 35.392 ence administering uthorization. 131 requiring a write 1 administration of t equiring a written d	written directive is of any other radio r attestation and or equivalent Agre [] 35.394 dosages in the fo ten directive in qui eater then 1.22 gip beta-emitter, or ph irective is required	er, or photon-emitting radionuclide with a phot s required enuclide for which a written directive is required signature: eement State requirements, as an authorized [2] 35.396 Nowing categories for which the proposed Aut antities less than or equal to 1.22 gigabecquer gabecquerels (33 millicuries)	lon energy less d user for: thorized User is rels (33

MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230 410-537-3000 • 1-800-633-6101• www.mde.state.md.us

Martin O'Malley Governor

Anthony G. Brown Lieutenant Governor

DEC 5 2011

Bryan A. DeFranco, M.D., Radiation Safety Officer Suburban Hospital 8600 Old Georgetown Road Bethesda, MD 210814

RE: Radioactive Material License #MD-31-002-01

Dear Dr. DeFranco:

Your requested amendment to radioactive materials license number MD-31-002-01 is enclosed. Please review it carefully to ensure that it reflects all modifications included in your letter received in this office on October 26, 2011.

Should you require further assistance, please contact Mr. Raymond E. Manley at (410) 537-3301. You may also reach our office toll-free by dialing 1-800-633-6101 and requesting extension 3301. Also, you may contact this office via facsimile at 410-537-3198.

Roland G. Fletcher, Manager IV Radiological Health Program Air and Radiation Management Administration

RGF/BM//DKM/cc

Enclosure(s): License amendment (60) Code (02120)



Robert M. Summers, Ph.D. Secretary



RADIOLOGICAL HEALTH PROGRAM RADIOACTIVE MATERIAL LICENSE

Page 1 of 5

Pursuant to the Maryland Radiation Act, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess and transfer radioactive material listed below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. The license is subject to all applicable rules, regulations and orders of the Maryland State Department of the Environment, now or hereinafter in effect and to any conditions specified below.

2. Address: 80	uburban Hospital 600 Old Georgetown Ro ethesda, Maryland 2081		 License No.: Amendment N Expiration Da 	
6. Radioactive m and mass numb	naterial (element	7. Chemical and/or	,	8. Maximum amount of activity which licensee may possess at any one time
A. Any radioactiv in Section G. 26.12.01.01	ve material listed	A. Any radioactive n Section G.100 of 26.12.01.01		A. As needed to perform diagnostic tests
	ve material listed in) of COMAR	B. Any radioactive n Section G.200 of 26.12.01.01		B. As needed to perform diagnostic tests
	ve material listed in) of COMAR	C. Any radioactive n Section G.300 of 26.12.01.01		C. 3000 millicuries
D. Xenon-133 E. Cobalt-57		D. Gas E. Sealed Source		 D. 600 millicuries E. No source to exceed 15 millicuries

9. Authorized Use(s):

A. Any uptake, dilution, and excretion procedure approved in Section G.100 of COMAR 26.12.01.01.

B. Any imaging and localization procedure approved in Section G.200 of COMAR 26.12.01.01.

C. Any radiopharmaceutical therapy procedure approved in Section G.300 of COMAR 26.12.01.01.

- D. Lung studies
- E. Reference, calibration and quality control.
- 10. The authorized place of use is the licensee's address stated in Item 2. The licensee must notify the Radiological Health Program 30 days prior to vacating a permanent use address.

P.3/7

P.4/7



RADIOLOGICAL HEALTH PROGRAM

RADIOACTIVE MATERIAL LICENSE

License	Number:	MD-31	-002-01

Amendment Number: 60

Page 2 of 5

CONDITIONS

11A. The radiation protection program shall be under the supervision of Bryan A DeFranco, M.D.

11B. Radioactive material shall be used by, or under the supervision of:		
Authorized User	Items of Use	
Mark Wolfman, M.D.	Items 6A, 6B, 6D, 6E.	
Bradley Dick, M.D.	Items 6A, 6B, 6D, 6E.	
Laura Beth Eisenberg, M.D.	Items 6A, 6B, 6D, 6E.	
A. Hanna Kim, M.D.	Items 6A, 6B, 6D, 6E.	
Paul D. Radecki, M.D.	Items 6A, 6B, 6D, 6E.	
Janet Marie Storella, M.D.	Items 6A, 6B, 6D, 6E.	
Stephen Adam Fine, M.D.	Items 6A, 6B, 6D, 6E.	
Douglas Allen Jones, M.D.	Items 6A, 6B, 6D, 6E.	
Harry Bingham, M.D.	Items 6A, 6B, 6E.	
M. Hafeez Chaudry, M.D.	Items 6A, 6B, 6E.	
Daniel Goldberg, M.D.	Items 6A, 6B, 6E.	
Martin Kavansky, M.D.	Items 6A, 6B, 6E.	
Lewis Lepson, M.D.	Items 6A, 6B, 6E.	
Mark Milner, M.D.	Items 6A, 6B, 6E.	
William Tullner, M.D.	Items 6A, 6B, 6E.	
Daniel Woronow, M.D.	Items 6A, 6B, 6E.	
Bryan A DeFranco, M.D.	Items 6A, 6B, 6C 6D, 6E	
Brian G. Johnson, M.D.	Items 6A, 6B, 6D, 6E	
Christopher P. Rothstein, M.D.	Items 6A, 6B, 6D, 6E	
Julia J. Muskie, M.D.	Items 6A, 6B, 6D, 6E	
Alan Kronthal, M.D.	Items 6A, 6B, 6D, 6E	
Richard D. Newman, M.D.	Items 6A, 6B, 6D, 6E	

- 12. The licensee shall comply with all appropriate provisions of COMAR 26.12.01.01 "Regulations for Control of Ionizing Radiation," and shall possess a copy of these regulations.
- 13A. Each sealed source containing radioactive material, other than Hydrogen-3 with a half-life greater than thirty (30) days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed six (6) months. In the absence of a certificate from a transferor indicating that a test has been made within six (6) months prior to the transfer, the sealed source shall not be put into use until tested. If there is reason to suspect that a sealed source might have been damaged, or might be leaking, it shall be tested for leakage before further use.
- 13B. The test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. The test sample shall be taken from the sealed source or from the surfaces of a device in which the sealed source is permanently mounted or stored on which one might expect contamination to accumulate.
- 13C. Records of leak tests shall be kept in units of microcuries and maintained for inspection by the Department.



RADIOLOGICAL HEALTH PROGRAM RADIOACTIVE MATERIAL LICENSE

Page 3 of 5

License Number: MD-31-002-01	Amendment Number: 60		
CONDITIONS			

- 13D. If the test reveals the presence of 0.005 microcurie or more of removable contamination, the licensee shall immediately withdraw the sealed source from use and shall cause it to be decontaminated and repaired or to be disposed of in accordance with Department regulations. A report shall be filed within five (5) days of the test with the Administrator, Radiological Health Program, 1800 Washington Boulevard, Suite 750, Baltimore, Maryland 21230, describing the equipment involved, the test results, and the corrective action taken.
- 13E. Test for leakage and/or contamination shall be performed by Krueger Gilbert Health Physics Inc.or by other persons specifically authorized by the Department, the U.S. Nuclear Regulatory Commission or another Agreement State to perform such services.
- 13F. Notwithstanding the periodic leak test required by this condition, any licensed sealed source is exempt from such leak tests when the source contains 100 microcuries or less beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.
- 13G. Except for alpha sources, the periodic leak test required by this condition does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another person unless they have been tested within six months prior to the date of use or transfer.
- 14. Sealed sources containing radioactive material shall not be opened.
- 15. The licensee shall conduct a physical inventory every six (6) months to account for all sealed sources received and possessed under the license. The records of the inventories shall be maintained for three (3) years from the date of the inventory for inspection by the Department, and shall include the quantities and kinds of radioactive material, location of sealed sources, and the date of the inventory.
- 16. The licensee may use the Calicheck or Lineator device for doing linearity tests of his dose calibrator provided he follows the procedures in the respective manual.
- 17. The licensee shall elute generators and process radioactive material with reagent kits in accordance with instructions furnished by the manufacturer on the label attached to or in the leaflet or brochure that accompanies the generator or reagent kit.
- 18A. The licensee shall perform a test to detect and quantify the activity of molybdenum-99 contamination in each elution of technetium-99m from a molybdenum-99/technetium-99m generator and in each extraction or separation of technetium-99m from molybdenum-99 not contained in a generator.
- 18B. The licensee shall not use technetium-99m for human use that contains more than 0.15 microcurie of molybdenum-99 per millicurie of technetium-99m. The limit for molybdenum-99 contamination represents a maximum value and molybdenum-99 contamination should be kept as low as reasonably achievable below this limit.
- 18C. The licensee shall establish written procedures for personnel performing tests to detect and quantify molybdenum-99 contamination. These procedures shall include all necessary calculations and steps to be taken if activities of molybdenum-99 in excess of the limit specified in Item <u>18</u>B, above are detected.

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RADIOLOGICAL HEALTH PROGRAM RADIOACTIVE MATERIAL LICENSE

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- Personnel performing tests to detect and quantify molybdenum-99 contamination shall be given specific training in performing these tests prior to conducting such tests.
 - (1) The licensee shall maintain for inspection by the Department records of the results of each test performed to detect and quantify molybdenum-99 contamination and records of training given to personnel performing these tests.
 - (2) Records described in Sub item (1) above shall be maintained for three (3) years following the performance of the tests and the training of personnel.
- 19. The licensee shall not transfer ownership and/or control of this license to any person or entity without providing required information regarding the transfer for the Agency's review and without receiving written authorization for the transfer by the Agency.
- 20. Food and beverage containers shall not be discarded in radioactive or normal trash containers in licensee's areas utilizing radioactive materials.
- 21A. The licensee shall not make any false statement, representation, or certification in any application, record, report, plan, or other document regarding radiation levels, tests performed or radiation safety conditions or practices. Additionally, the licensee shall not falsify, tamper with, or render inaccurate any monitoring device or method.
- 21B. Violation of any term, condition, or regulation could subject the licensee to administrative or civil penalty or criminal prosecution, as specified in Title 8, Radiation, of the Article Environment of the Annotated Code of Maryland.

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RADIOLOGICAL HEALTH PROGRAM RADIOACTIVE MATERIAL LICENSE				
	Page 5 of 5			
License Number: MD-31-002-01	Amendment Number: 60			
CON	DITIONS			
22. Except as specifically provided otherwise by this material authorized by this license in accordance we contained in:				
 Application letter with attachments dated August 28, 2009; Letter dated August 1, 2011, with attachments, requesting the addition of Bryan A DeFranco, M.D. as an authorized user, the removal of Wayne Jeffery Olan, M.D. and Michelle Therese Kladakis, M.D. as authorized users and the replacement of Mark Wolfman, M.D. as Radiation Safety Officer with Bryan A DeFranco, M.D. Letter with attachments dated August 26, 2011, adding Brian G. Johnson, M.D., Christopher P. Rothstein, M.D., Julia J. Muskie, M.D., Alan Kronthal, M.D., and Richard D. Newman, M.D. as Authorized Users. Letter dated October 25, 2011, with attachments, adding Bryan A DeFranco, M.D. as an authorized user of COMAR 26.12.01.01 § G.300 material. 				
COMAR 26.12.01.01 "Regulations for Control of Ionizing Radiation" shall govern the licensee's statements in applications or letters, unless the statements are more restrictive than the regulations.				
October 27, 2011	THE MARYLAND DEPARTMENT OF THE ENVIRONMENT When the second secon			

This is to acknowledge the receipt of your letter/application dated

 $\frac{02/03/2062}{1000}$, and to inform you that the initial processing which includes an administrative review has been performed. $Amendment \quad (08-07398-03)$ There were no administrative omissions. Your application was assigned to a

There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 576913. When calling to inquire about this action, please refer to this control number. You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI) (6-96) Sincerely, Licensing Assistance Team Leader