

# U.S. NUCLEAR REGULATORY COMMISSION

## TELEPHONE CONVERSATION RECORD

Date: 1/12/2012

Time:

Mail Control or Report No(s): 576408 License No(s): 16-03657-01 Docket No(s): 03001748

Name of Licensee: Department of the Army, Ireland Army Community Hospital (Fort Knox)

Name of Participant(s): CPT Sarah Sublett, RSO

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Subject: 35.300 Authorizations

This record represents a series of communications by telephone and e-mail between 12/19/2011 and 1/12/2012 regarding the amendment request to add MAJ Hajibrahim as authorized user (AU) for 35.300.

The amendment request indicated that the licensee's Radiation Safety Committee (RSC) approved this physician for full 35.300 use. I informed CPT Sublett that the credentials submitted for MAJ Hajibrahim demonstrate that he meets the qualifications for oral administration of sodium iodide I-131 under 35.300, but not for unrestricted 35.300 use. I suggested that CPT Sublett discuss the requirements for full vs. partial 35.300 authorizations with the RSC to ensure that future approvals are consistent with the regulations.

I informed CPT Sublett of the need to show that the supervisor/preceptor meets the qualifications of AU for the same use. In this case, the NRC was able to obtain a copy of the referenced Florida radioactive materials license showing that MAJ Hajibrahim's supervisor/preceptor, Dr. Drane, is authorized for the Florida equivalent of 35.300 use.

I informed CPT Sublett that there is an inconsistency in the current license that should be resolved: Items 6C and 9C limit 35.300 use to I-131, but Item 12B authorizes Drs. Oliff and Tate for full 35.300 use. History: The license file shows that 35.300 procedures were authorized without restriction until Amendment 60. Although not clearly discussed in licensing documentation, it was necessary to limit 35.300 use to I-131 in Amendment 61 because there was no AU qualified for full 35.300 use. Beginning with Amendment 62, there has always been at least one AU qualified for full 35.300 use, but Items 6C and 9C remained limited to I-131 use. Inspection records show that oral administration of sodium iodide I-131 has been the only 35.300 use under this license. Action: I asked CPT Sublett if the licensee wishes to (a) return Items 6C and 9C to full 35.300 use, or (b) restrict Drs. Oliff and Tate to I-131 use in Item 12B. She informed me that the licensee wishes to return Items 6C and 9C to full 35.300 use.

**Action Required:** Issue amendment, authorizing MAJ Hajibrahim for oral administration of sodium iodide I-131 and returning Items 6C and 9C to full 35.300 use

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SUNSI Review Completed By: S. Gabriel

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