



**DEPARTMENT OF THE NAVY**  
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6470  
Ser OEM/ 000383  
10 MAR 2004

From: Commanding Officer, Navy Environmental Health Center  
To: Distribution

Subj: ADDENDUM TO: NAVAL RADIATION SAFETY COMMITTEE BULLETIN 2004-01;  
RECEIPT, STORAGE AND SECURITY OF RADIOACTIVE MATERIALS

Ref: (a) NAVENVIRHLTHCEN ltr 6470 Ser OEM/000159 of 13 Feb 04: Receipt, Storage and  
Security of Radioactive Materials (Naval Radiation Safety Committee Bulletin  
2004-01)  
(b) Title 10, Code of Federal Regulations (CFR), Part 20

1. Regarding the security and control of radioactive material at medical and research facilities throughout the Naval Radioactive Material Permit (NRMP) Program, reference (a) was submitted to all permittees for compliance. Official command response to reference (a) is required from all permittees prior to the 12 March 04 deadline.

2. Per "action" item 4(b) in reference (a), commands are required to provide secondary security measures for high activity radioactive materials that fall into the Nuclear Regulatory Commission's reporting requirements in 10 CFR 20.2201(a)(i) of reference (b). Secondary security measures were specified to be either a secure safe or locked cabinet. After further evaluation of this requirement, the following exemptions and clarifications are hereby provided:

a. It was determined that it may not be practical or possible to secure the Mo/Tc-99m generator that is currently in use; therefore, commands shall be exempt from the requirement to secure the "active" generator by secondary means.

b. To reduce the risk of radiation exposure to hospital staff and members of the public, newly procured Mo/Tc-99m generators are typically delivered after normal working hours. Individual command standard operating procedures specify that the delivery courier, under escort by the command's duty staff or by security, delivers the generator directly to a specified location. The duty staff unlocks the door to the room, directs the courier to place the package in the room, and then re-locks the door upon exiting. For this situation only, the command shall be exempt from the requirement to secure the "newly delivered" Mo/Tc-99m generator by secondary means; however, the generator shall either be put into use or placed into storage and secured by secondary means, prior to close of business the next working day. The same time frame shall apply for outgoing generators "awaiting after hours pickup" by the courier.

c. As an alternative to securing the radioactive material in a locked cabinet or safe, it is acceptable to secure the radioactive material behind a locked door (i.e., closet or storeroom) within

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a properly secured room, as long as both doors remain locked when not under constant surveillance.

d. I-131 in either liquid or capsule form, shall either be administered to a patient the day it is received, or shall be placed into storage and secured by secondary means. Another alternative would be to return the unused I-131 back to the distributor the same day it is received. Note that this also applies to any other radioactive material that falls into the reporting requirements in 10 CFR 20.2201(a)(i) of reference (b).

3. This letter, in addition to the Naval Radiation Safety Committee Bulletin 2004-01 (reference (a)) shall be maintained on file with your NRMP and shall be considered as an integral part of your NRMP.

4. Any questions pertaining to the requirements of this letter can be directed to LCDR Brian Pomije, commercial (757) 953-0766/0768 or DSN 377-0766/0768, facsimile (757) 953-0685 or e-mail at [pomijeb@nehc.med.navy.mil](mailto:pomijeb@nehc.med.navy.mil).



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