

DISPOSITION FORM

ARM2.950127.002

(AR 340-15)

OFFICE SYMBOL OR FILE REFERENCE	SUBJECT	
MEDEN-CO	Use of Radioisotopes	
TO Ch, Physiology Div	FROM CO, USAMRNL	DATE 6 Nov 64 CMT I JEC/bw/21108

1. The U. S. Atomic Energy Commission By-product Material License #5-46-13 (A 66) under which this Laboratory is permitted to utilize radioisotopes in research studies specifically states in para 10 "unless otherwise specified, the authorized place for use is the licensee's address stated in item 2 above". Item 2 denotes that the proper address of this Laboratory is at Fitzsimons General Hospital, Denver, Colo.

2. In a memorandum for record dated 6 Aug 64, which was distributed to all division chiefs, USAMRNL, it was clearly stated that if we desired to use radioisotopes outside of Denver, Colo that this Laboratory had to submit a request for amendment to our license. To date only two such amendments permitting use of radioisotopically labeled material away from Denver have been received by this Laboratory. These two amendments permitted the use of C-14 labeled ascorbic acid and I¹³¹ or I¹²⁵ in conjunction with the high altitude studies which are nearing completion.

3. Title 10 Code of Federal Regulations clearly indicates the Atomic Energy Commission has the authority to designate the nature, extent and location of use of radioactive isotopically labeled materials.

4. It has recently been brought to my attention that during the recent high altitude studies conducted at Pikes Peak that two investigators from your division utilized radioactive isotopes in certain research studies. These isotopes included rubidium 86 and certain C-14 labeled amino acids. The above mentioned materials had not been approved under our AEC License for utilization outside Denver, Colo. It is realized that the AEC regulations do exempt the use of specified minute amounts of radioactive labeled materials away from the location of a licensed laboratory. However, from the data available to me it is impossible to discern whether these exemptions were exceeded.

5. It is requested that the two investigators concerned determine the specific microcurie amounts of radioisotopically labeled material, i. e., rubidium 86 and each of the C-14 labeled amino acids utilized at Pikes Peak. It is requested that this information be forwarded to me no later than 1530 hrs on 10 November 1964 in order that the Radiological Safety Officer at Fitzsimons General Hospital can determine if a direct violation of the AEC regulations has occurred and, if so, what procedures are required under the AEC regulations.

DA FORM 2496-1 REPLACES DD FORM 96 (STENCIL), EXISTING SUPPLIES OF WHICH WILL
1 FEB 62 BE ISSUED AND USED UNTIL 1 FEB 63 UNLESS SOONER EXHAUSTED.

Washington National Record Center
Office of the Army Surgeon General

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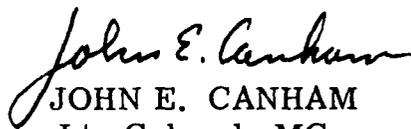
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FROM: CO, USAMRNL

DATE: 6 Nov 64 CMT 1

6. Violations of the AEC regulations not only jeopardizes the continued use of radioactive isotopes in research projects at this Laboratory, but also at Fitzsimons General Hospital. Therefore, we must do everything within our power to prevent further violation of the regulations. Suggestions for means of preventing these violations would be most appreciated. This subject will come up for further discussion at a staff meeting to be held on 17 November.


JOHN E. CANHAM
Lt. Colonel, MC
Commanding

MEDEN-PH

THRU: Ch, Physiol Div

FROM Asst. Ch, Physiol Div DATE 10 Nov 64 CMT 2

TO: CO, USAMRNL

1. Your DF dtd 6 Nov 64 concerning the use of C-14 labeled amino acids and Rb⁸⁶Cl on Pikes Peak has been forwarded to me for comment by Lt. Col. Hansen. It is acknowledged that Dr. Klain and I, respectively, used these isotopes at the aforementioned site, probably in violation of AEC regulations. The undersigned accepts full responsibility for this violation. Dr. Klain was new to the Laboratory and was unaware of the need for an amendment to our license prior to conducting experimental isotope work away from the Laboratory. Lt. Col. Hansen, it should be indicated, was away from the Laboratory on other phases of the Pikes Peak study at the time these isotopes were being used.

2. The amount and form of radioisotope used by Dr. Klain and myself are as follows:

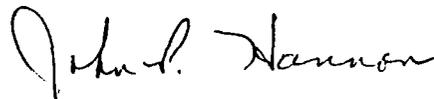
- a. Alanine-U-C¹⁴, 5μc injected I. P. in each of 6 rats.
- b. Glutamic Acid-U-C¹⁴, 5μc injected I. P. in each of 6 rats.
- c. Lysine-U-C¹⁴, 5μc injected I. P. in each of 5 rats.
- d. Methionine-U-C¹⁴, 5μc injected I. P. in each of 5 rats.
- e. Rb⁸⁶Cl, 8μc injected I. V. in each of 16 rats.

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3. In total, therefore, 120 μ c of U-C¹⁴ labeled amino acids and 128 μ c of Rb⁸⁶ were used. It is felt that adequate safety precautions were used in handling these isotopes. All radioactive samples, waste materials, and animal carcasses were returned to the Laboratory within two days of isotope administration for processing and disposal according to AEC regulations.

4. In accepting full responsibility for this probable violation of AEC regulations I agree to accept any disciplinary action as may seem warranted.



JOHN P. HANNON, Ph. D.
Assistant Chief
Physiology Division

MEDEN-PH

TO: CO, USAMRNL FROM: Chief, Physiol. Div. DATE 10Nov64 CMT 3

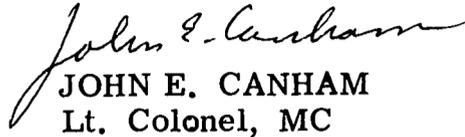
1. Dr. Hannon, an extremely experienced and competent investigator, has accepted full responsibility for the probable violation in AEC regulations. He participated and contributed in many ways to the apparent success of the Altitude Study.
2. Captain Surks, the officer in charge of the Radioisotope Laboratory, Dr. Hannon, and myself were all absent from the Laboratory here for extended periods of time since August. In my opinion, these violations occurred because of the overextension of the investigator staff during the last four months. Invalid assumptions were made. I accept full responsibility for encouraging and allowing this overextension and the resulting violations.
3. All investigators named realize the necessity for reducing commitments and doing everything within our power to prevent any further violations. To this end I will personally discuss with each member of our Division the importance and necessity of strict adherence to all military and AEC regulations concerning the use of radioisotopes.

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4. The above is brought to your attention, for any necessary action. Your suggestions as to further measures we should take to prevent a recurrence of this violation would be appreciated.

1 Incl:
DF to Div. Chiefs dtd 27Nov.


JOHN E. CANHAM
Lt. Colonel, MC
Commanding