



DEPARTMENT OF VETERANS AFFAIRS
Ralph H. Johnson Medical Center
109 Bee Street
Charleston SC 29401-5799

January 26, 2000

In Reply Refer To: 534/114-1

U.S. Nuclear Regulatory Commission
Regional Administrator, Region II
Sam Nunn Atlanta Federal Center
61 Forsythe Street, SW, Suite 23T85
Atlanta, Georgia 30303-8931

Dear Sirs:

Subject: REPLY TO A NOTICE OF VIOLATION
(NRC Inspection Report No.39-12130-02/99-01)
Docket No. 030-03230
License No. 39-12130-02

The following is our response to your Notice of Violation concerning Condition 20 of NRC License No. 39-12130-02 and Chapter IV, Section E of the Radiation Safety Manual, page 69, Subsection 5 and 6.

1. We acknowledge the Notice of Violation dated January 10, 2000 concerning the failure to enforce the policy of "No eating, drinking, smoking or applying cosmetics within an area where radioactive materials are stored or used. Also, the existence of an unrestricted area (the Technician's Office) within a restricted area (the Nuclear Medicine treatment Area) was noted. A misunderstanding by the individual carrying the open container was the root cause for the violation.

2. Corrective steps, which have already been taken, are as follows:

I) During the inspection conducted by the NRC on 12/14/99 and 12/15/99, the inspector observed an individual entering the Nuclear Medicine area with an open coffee cup. The individual did not drink while in the Nuclear Medicine area. The inspector mentioned this instance to the Radiation Safety Officer as well as inquired as to the presence of an unrestricted area (Technician's office) within a restricted area (the Nuclear Medicine treatment area). The Radiation Safety Officer responded immediately by placing a sign stating that "NO UNCOVERED FOOD OR BEVERAGE CONTAINERS ARE PERMITTED". Similarly a sign was also placed on the doorway into room B206B indicating that that room was acceptable as an unrestricted area to eat and/or drink. This room had been designated as an unrestricted area during the previous Radiation Safety Officer's (Mike Kaiser) tenure. The placement of the signs by the RSO was deemed as an acceptable solution according to the Inspector.

II) The individual that brought the coffee cup into the restricted area was aware of the no drinking and eating policy, but unaware that all foods must be covered during transport through this area to the office. The individual was also unaware that carrying the open cup into the Nuclear Medicine area was a violation. The individual was contacted, the rules, and the proper procedures pertaining to eating, drinking, etc, in a restricted area were reviewed. The RSO was assured that the incident would not be repeated. (Compliance Achieved 12/15/99)

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3. Further corrective actions to be instituted are as follows:

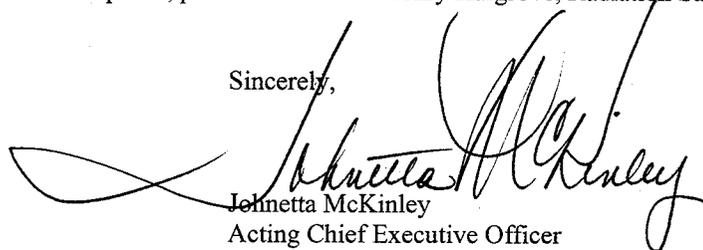
I) All individuals, who work in or have access to the Nuclear Medicine area, will be required to review all Radiation Safety rules and training as well as take a test pertaining to those rules and procedures. All individuals working in the Nuclear Medicine area have been instructed concerning the proper procedure for the transport of food containers into the Technician's office.

II) A request to renovate the Nuclear Medicine area to switch the use of B206A and B206B has been submitted to the CEO's office for review and approval. (Drawing enclosed). The renovation would require the enlargement of room B206B to accommodate the Cardiac Stress Equipment and the reduction of room B206A in the process. A separate door into the corridor would be installed into B206A as well as a sink for hand washing. The switching of the two rooms and addition of a separate entrance would totally eliminate the transport of food into or through the restricted area. The cost of the renovations would be approximately \$2500 and should be completed within 3 months, tentatively. Construction will be completed in such a manner as to disrupt as few nuclear medicine procedures as possible.

4. Full compliance for sections 2, subsection I and II of the Reply to Notice of Violation were achieved on 12/15/99. Full compliance for section 3, subsection I of the Reply to Notice of Violation was achieved through the initiation of the SynQuest computer-training program on 01/01/2000. Compliance through the renovation of Nuclear Medicine is dependent upon completion of the construction. Tentative completion not to exceed 3 months.

If additional information is required, please contact Mr. Henry Hargrove, Radiation Safety Officer, at 843-792-4255.

Sincerely,



Johnetta McKinley
Acting Chief Executive Officer

Enclosure

Cc:

US Nuclear Regulatory Commission, Washington, DC
Department of Veterans Affairs
National Health Physics Program (115HP)