



eastern[™]
isotopes

Post Office Box 1096 • Ashburn, Virginia 20146 • Phone (703) 787-7900 • Fax (703) 478-0499

Mr. Doug Collins
USNRC, Region II
Suite 23T85
61 Forsyth Street, SW
Atlanta, GA 30303-3415

Mr. James DeKraft
Virginia State Department of Health
Radiological Health Department
P.O. Box 2448
Room 240
Richmond, VA 23218

31 October 2001

Dear Sirs,

This letter is in follow-up to your respective agencies visit to our Sterling Virginia facility and subsequent teleconference of October 30, 2001, between your agencies and Eastern Isotopes, Inc. oversight committee, regarding the matter of an overexposure of one of our pharmacists.

Pursuant to the conversations and recommendations made during these meetings, Eastern Isotopes, Inc. proposes the following:

With regards to determining the actual dose to fingertips of the pharmacist involved, Eastern Isotopes, Inc. will attempt to calculate and extrapolate the theoretical dose received to the fingertips. This will be achieved by experimentation utilizing TLD measurement devices, exposed to a source approximating the strength of the one involved, at various controlled distances from the source. The exposures will be made for a length of time approximating the time involved with the pharmacist performing the splitting action. We will also attempt to calculate the dose mathematically utilizing MicroShield and Monte Carlo program simulations.

Our action to insure that the pharmacist in question does not receive any additional occupational exposure is to relegate the pharmacist to administrative tasks. The pharmacist will have no duties requiring the handling of radioactive materials, and/or potential occupational radiation exposure.

To assure there are no further over exposure of other personnel involved in the handling of radioactive materials, Eastern Isotopes, Inc. will continue to have designated FDG handlers to be monitored by weekly badges. We will continue to approximate exposure of handlers on a per dose basis and trend this data, and we will continue to emphasize and reinforce the availability and necessity of using protective measures. Examples of readily available protective measures include; fixed shielding, syringe shields, non-permeable double gloves, routine hand monitoring while drawing doses, specialized tools and tongs, and robotics for dose manipulations. Eastern Isotopes, Inc. has updated our written protocols. The RSO will continue to do frequent compliance and procedural checks. We will inform all handlers of this incident and it's subsequent findings.

Subsequent to our teleconference on Tuesday, October 30, 2001 we received from Landauer the outstanding badge readings for the pharmacist in question. This report had a reading of 44,360 on the right, and 41,460 on the left. Please note these badges were sent without the control for an emergency reading.

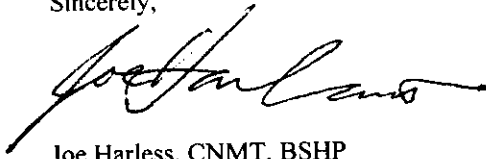


110503

Eastern Isotopes, Inc. investigation of this event will be thorough and intensive. Pursuant to our teleconference, we would like to request an extension to the 30-day time limit usually allocated, by an additional 15 days. The reason for this request was stated in the teleconference and is restated hereafter. Eastern Isotopes, Inc. will employ a Certified Health Physicist, beginning on November 5, 2001. Mark Smith, CHP presently works for our parent company IBA. He has been apprised of the incident and is part of our investigative team, however, he will not be at our full disposal until November 5th. His expertise will be an asset as we attempt to quantify actual dose and recreate the events of the incident. We also feel that we may need additional time to conduct a time and motion analysis of the pharmacist actions and translate them into a relevant reenactment to further determine dose causation. The monitors for this experiment will then need to be processed and the data reviewed. While we will certainly make every effort to comply with the 30 day reporting constraint, we would like to at this time formally request consideration for an extension.

Eastern Isotopes, Inc. wishes to thank your offices for your assistance with this matter, and your efforts to help further both of our goals of a safe workplace. We look forward to working with you to achieve a satisfactory outcome to this incident.

Sincerely,



Joe Harless, CNMT, BSHP
Vice President, General Operations, Eastern Isotopes, Inc.

CC:

John Zehner, RPh, President, Eastern Isotopes, Inc.
Scott Chance, RPh, Director of Pharmacy Services, Eastern Isotopes, Inc.
John Thomas, PharmD, RSO, Eastern Isotopes, Inc.
Dawn Eaton RPh., Eastern Isotopes, Inc.
Jim Kostka, Regulatory Adjunct, Eastern Isotopes, Inc.
Mark Smith, CHP, IBA

