Stephen T. Altier 2100 Watson Ave. St. Paul, MN 55116

June 19, 2002

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U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

## RE: Response to Apparent Violations, IA-02-010

Dear NRC Enforcement Committee:

I am writing to you today to respond to violations I committed on June 17, 2001. I administered Technetium-99m to my relative without proper authorization from a physician. In the letter from the Nuclear Regulatory Commission (NRC) dated April 23, 2002, I'm asked to respond to the allegations. Below I will give testimony regarding my actions, fully understanding that I am writing to you under oath.

The reason for the violation is that I administered a radioactive dose to a relative without the proper authorization of a physician. At 9:00 a.m. on June 17, 2001, I injected 25 mCi of Tc99m-MDP to my mother-in-law. At the time of injection, I also took pictures to show blood flow to her feet. At 11:30 a.m. on the same day, I took delayed pictures to see how the isotope had been distributed throughout her anatomy. After the pictures were finished, I gave her a film with the images on it.

As result of my actions, I was terminated as an employee of United Hospital on September 17, 2001. Therefore, the corrective action to ensure that this will never happen again at United Hospital is that I no longer have the privilege to work there as a Nuclear Medicine Technologist. I lost a job that was not only fun to do, I also put several people in jeopardy of losing their jobs, possibly causing injury to my relative, and putting United Hospital in violation of NRC code(s). For this, I am extremely sorry for my actions and only wish I could go back to undo what I have done.

As far as ensuring this from happening in the future is probably the hardest part of this assignment. The only thing that I can do is give you my word that it will never happen again. My reputation has been scarred and I can assure you this will never happen to me again as long as I am Nuclear Medicine Technologist. My unethical choices on June 17, 2001 will be with wife and I for the rest of our lives.

I have been asked to address some other issues regarding my actions on June 17, 2001. They are as listed:

1. The measured activity of the Tc99m-MDP and the time of measurement was 25 mCi measured at 8:57 a.m. on June 17, 2001.

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2. The activity level at 9:00 a.m. (time of administration) was 25 mCi Tc99m-MDP.

3. The specific reason why I did not obtain an order, prescription, or authorization...I really can't answer this. I do not know why I did not get authorization. After visiting her doctor several times, she was still having intense pain in her foot and I told her to come down and get a bone scan. I don't know what else to say other than this the point that I wish I could go back and undo what I did.

4. I did not make the required record of administration. My reason for doing this is so that if anyone came across this name in the nuclear record they could not try to match it with a medical record. To say it very bluntly, I did not want to be caught. I know this only makes me look worse now, but I do not want to lead you in any other direction than what is the truth.

I have read Section VIII, Enforcement Actions Involving Individuals on the NRC Enforcement policy. In my wrongdoing I have accepted all responsibility for actions, whatever that may be. Knowing that I acted unethically, I answered all questions truthfully and to the best of my ability. I cooperated with the staff of United Hospital and the NRC Office of Investigation once my wrongdoing was questioned. It is my hope that United Hospital will not have any enforcement action held against them. If there is any enforcement to be taken, it should be taken against me.

The incident that occurred on June 17, 2001 is a lesson that I have learned the hard way. I lost a job and several good friends that meant a lot to me. I also tarnished my reputation as a Nuclear Medicine Technologist and as an ethical person. I ask that you consider everything that I have said as the truth and if you have any questions to call me anytime. If I could only go back and undo the things I did.

Sincerely,

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Stephen T. Altier Certified Nuclear Medicine Technologist

Cc: Regional Administrator Enforcement Officer NRC Region VIII 801 Warrenville Road Lisle, Illinois 60532-4351 SIGNATURO ATTESTATION. 06.20.2002

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