

June 25, 2003

Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Reply to a Notice of Violation and related Notice of Deviation

This letter is in response to the results of our most recent inspection where certain deficiencies in our training program were found. Each of these deficiencies is listed below, as well as the corrective action taken.

*Violation A, Section 3.1.12 of the Emergency Plan requires that an annual training program, including principles of radiation safety and contamination control, be conducted for the emergency room staff of the (Pullman Memorial) hospital.*

*Section 10.1 of the Emergency Plan requires that, among other support groups, Memorial Hospital emergency room personnel be trained on an annual basis in radiation safety and Nuclear Radiation Center emergency procedures.*

*Contrary to the above, during 2001, 2002, and to-date in 2003, the Nuclear Radiation Center had not provided training in radiation safety and Nuclear Radiation Center emergency procedures for Pullman Memorial Hospital emergency room personnel.*

This first Violation (as well as the additionally noted Deviation) was our failure to provide annual training to the Hospital staff in accordance with sections 3.1.12 and section 10.1 of our Emergency Plan. This deviation was due to a failure of the staff to have the training requirements placed into a maintenance checklist, as well as a historical misunderstanding of our Emergency Plan. Although the plan calls for annual training, the intention when the plan was written was to provide such training on a rotating annual basis. Thus, the training was provided to these groups on a rotating basis.

The corrective steps taken include a proposed revision of our Emergency Plan under 50.54q, the notification of which is included with this document. Also, we have added Hospital Staff training to our annual 'Administrative Requirements' maintenance log. All of these actions have already been taken. Until this proposed revision is approved, training will be provided to all groups on an annual basis, conforming to the language of the plan.

*Violation B, Section 8.4 of the Emergency Plan requires that written agreements with respect to arrangements for hospital, medical, and other emergency services shall be updated on a biennial basis.*

*The agreement between the licensee and the hospital, entitled "Emergency Service Agreement in the Event of a Radiological Incident at the Washington State University (WSU) Nuclear Radiation Center," in effect from April 1, 2000, through March 31, 2002, and the one currently in effect, states that Pullman Memorial Hospital has been provided with a copy of the WSU Nuclear Radiation Center Emergency Plan and the associated implementing procedures. The agreement further states that Pullman Memorial Hospital agrees to participate in annual training sessions for the individuals who will provide the support services as well as an annual drill exercise.*

*Contrary to the above, during an interview on May 8, 2003, representatives of the Pullman Memorial Hospital stated that they had not been provided with a copy of the WSU Nuclear Radiation Center Emergency Plan and the associated implementing procedures. Also, during the years 2001, 2002, and to-date in 2003, no annual drill exercises have been conducted by the WSU Nuclear Radiation Center with the Pullman Memorial Hospital.*

This second failure was in part due to the fact that Pullman Memorial Hospital could not find a copy of our Emergency Plan. This is due to its accidental misplacement of the Emergency Plan by hospital staff.

The corrective action for this involved taking a current copy of our Emergency Plan to the Hospital, and ensuring that it is in the hands of an appropriate, responsible person, such as the Emergency Room Manager. This action has been taken. A signature noting the receipt of the Plan has been signed by the appropriate PMH staff member and stored in the facility 'Drills' notebook. Moreover, a joint drill is planned for the WSUNRC and the PMH emergency room before July 15.

Should the USNRC have any comments or questions about this response, please feel free to contact the WSU Nuclear Radiation Center either by telephone, at (509) 335-7669 or by email at [ssharp@mail.wsu.edu](mailto:ssharp@mail.wsu.edu). Thank You.

Sincerely,



James N. Petersen  
Vice Provost for Research  
Battelle Distinguished Professor of Bioprocessing

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6/23/03

Marvin Mendonca  
Project Director  
US Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Mendonca:

This letter is to request a 10 CFR 50.54 q change to our Emergency Plan. Currently, plan section 10.1 Training reads, 'In addition, the W.S.U. Campus Police, W.S.U. Fire Department and Ambulance Service and Memorial Hospital emergency room personnel are trained on an annual basis in radiation safety and Nuclear Radiation Center emergency procedures.'

Historically, this has been construed to mean that training would be provided to these groups on a rotating annual basis. Therefore, we would like to change this to read, 'trained on a rotating annual basis.' This change should also be made to section 3.1.12 of the emergency plan to ensure consistency.

Should you have any comments or questions associated with this change, please contact me at (509) 335-7669 or by email at [ssharp@mail.wsu.edu](mailto:ssharp@mail.wsu.edu)

Sincerely,

Stephanie Sharp-Dugan,  
Reactor Supervisor, WSUNRC