



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

September 1, 2005

Docket No. 03003159
EA No. 05-164

License No. 37-12240-01

Joseph J. Saunders
Vice President of Operations
Crozer-Chester Medical Center
One Medical Center Boulevard
Upland, PA 19103-3995

SUBJECT: INSPECTION 03003159/2005001, CROZER-CHESTER MEDICAL CENTER,
UPLAND, PENNSYLVANIA SITE AND THE TAYLOR DIVISION, RIDLEY PARK,
PENNSYLVANIA SITE

Dear Mr. Saunders:

On June 22-24, 2005, Randolph Ragland and Christopher Hott of this office conducted an onsite safety inspection at the above address and at your Taylor Division, Ridley Park, Pennsylvania site of activities authorized by the above listed NRC license. The inspection was continued in our office until July 28, 2005 to gather additional information. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selected examination of representative records. The findings of the inspection were discussed with you and others of your organization at the conclusion of the onsite inspection.

Based on the results of this inspection, one apparent violation was identified and is being considered for escalated enforcement action in accordance with the NRC Enforcement Policy. On November 19, 2004, a high dose rate remote afterloader (HDR) unit containing Iridium-192 was left unsecured and unattended in your HDR treatment room. Please refer to Section IV of the enclosed inspection report for additional information regarding this apparent violation. Because the NRC has not made a final determination in this matter, no Notice of Violation is being issued for this inspection finding at this time.

On August 12, 2005, Randolph Ragland of this office, contacted Diana Stockdale, your Radiation Safety Officer, and she indicated your wish to attend a predecisional enforcement conference. A predecisional enforcement conference, open to the public, to discuss the apparent violation has been scheduled for September 20, 2005 at 10:00 a.m. If necessary, portions of the conference will be closed to the public to discuss sensitive security aspects of the apparent violation. The NRC announces enforcement conferences to the public by issuing a press release. The decision to hold a predecisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference is being held to obtain information to assist the NRC in making an enforcement decision. This may include information to determine whether a violation occurred, information to determine the significance of a violation, information related to the identification of a violation, and information related to any corrective actions taken or planned. The

conference will provide an opportunity for you to provide your perspective on these matters and any other information that you believe the NRC should take into consideration in making an enforcement decision. In addition, this is an opportunity for you to point out any errors in our inspection report and for you to provide any information concerning your perspectives on 1) the severity of the apparent violation, 2) the application of the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy, and 3) any other application of the Enforcement Policy for this case, including the exercise of discretion in accordance with Section VII. In presenting your corrective action, you should be aware that the promptness and comprehensiveness of your actions will be considered in assessing any civil penalty for the apparent violation. The guidance in the enclosed NRC Information Notice 96-28, "SUGGESTED GUIDANCE RELATING TO DEVELOPMENT AND IMPLEMENTATION OF CORRECTIVE ACTION," may be helpful.

In addition, please be advised that the characterization of the apparent violation described in the enclosed inspection report may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding the apparent violation is required at this time.

Current NRC regulations are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, industrial, and academic uses of nuclear material**; then **toolkit index page**. The Current General Policy and Procedure for NRC Enforcement Actions are included on the NRC's website at www.nrc.gov; select **What We Do, Enforcement**, then **Enforcement Policy**. Or you may obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 9:00 p.m. EST, Monday through Friday (except Federal holidays).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. The enclosed inspection report will not be made available for public inspection in the Public Document Room or electronically from ADAMS because it contains specific information concerning the isotopes, activities and locations of radioactive material authorized by your license.

Thank you for your cooperation.

Sincerely,

Original signed by John D. Kinneman

George Pangburn, Director
Division of Nuclear Materials Safety

Enclosures:

1. Inspection Report No. 03003159/2005001 (**Not Public in ADAMS**)
2. NRC Information Notice 96-28

J. Saunders
Crozer-Chester Medical Center

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cc:
Diana Stockdale, Radiation Safety Officer
Commonwealth of Pennsylvania

J. Saunders
Crozer-Chester Medical Center

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NAME	RRagland PJH1 for		CHott PJH1 for		PHenderson PJH1		GPangburn JDK for	
DATE	8/29/05		8/29/05		8/29/05		8/29/05	
OFFICE	RC/RI	N	ORA	N				
NAME	KFarrar KLF		DHolody JRW for					
DATE	8/31/05		9/1/05					