



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

October 3, 2005

Docket No. 03003159

License No. 37-12240-01

Joseph J. Saunders  
Vice President of Operations  
Crozer-Chester Medical Center  
One Medical Center Boulevard  
Upland, PA 19013

SUBJECT: PREDECISIONAL ENFORCEMENT CONFERENCE, CROZER-CHESTER  
MEDICAL CENTER, REPORT NO. 03003159/2005002

Dear Mr. Saunders:

This letter refers to the Predecisional Enforcement Conference held with you and other members of your staff on September 20, 2005 at the NRC Region I office, King of Prussia, Pennsylvania. This meeting enabled us to gain a better understanding of your position and your completed and planned actions to correct the apparent violation identified at your facility. A report summarizing the meeting is enclosed.

You will be advised by separate correspondence of the results of our deliberations on this matter. No response is required at this time.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosure will be placed in the Public Docket Room.

Thank you for your cooperation.

Sincerely,

***Original signed by Francis Costello***

Francis Costello, Acting Director  
Division of Nuclear Materials Safety

Enclosure  
NRC Report No. 03003159/2005002

cc:  
Diana Stockdale, Radiation Safety Officer  
Commonwealth of Pennsylvania

J. Saunders  
Crozer-Chester Medical Center

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DATE	10/3/05		10/3/05	10/3/05		

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U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

ENFORCEMENT CONFERENCE SUMMARY

Report No. 03003159/2005002  
Docket No. 03003159  
License No. 37-12240-01  
Licensee: Crozer-Chester Medical Center  
Facility Name: Crozer-Chester Medical Center  
One Medical Center Boulevard  
Upland, PA 19013  
Conference Date and Time: September 20, 2005 at 10:00 a.m.  
Conference Location: NRC Region I, King of Prussia, Pennsylvania

	/RA/	10/03/05
Inspectors:	_____ Christopher A. Hott Health Physicist	_____ date
	/RA/	10/3/05
	_____ Randolph C. Ragland, Jr. Senior Health Physicist	_____ date
	/RA/	10/3/05
Approved By:	_____ Pamela J. Henderson, Chief Medical Branch Division of Nuclear Materials Safety	_____ date

## CONFERENCE SUMMARY

NRC Enforcement Conference Report No. 03003159/2005002

On September 20, 2005, representatives of Crozer-Chester Medical Center met with NRC management in the Region I office located in King of Prussia, Pennsylvania. The meeting was open to the public, was held to discuss the findings described in NRC Inspection Report No. 03003159/2005001, and the apparent violation for the failure to control and maintain constant surveillance over a high dose rate remote afterloader (HDR) containing approximately 9 curies of Ir-192.

Mr. Francis Costello, Acting Director of Division of Nuclear Materials Safety, made the opening remarks and briefly described the purpose of the conference. Mr. John Wray, Region I Enforcement Specialist, described the NRC Enforcement Policy and process. Ms. Pamela Henderson, Chief, Medical Branch, reviewed the apparent violations described in the inspection report.

Ms. Diana Stockdale, Crozer-Chester Radiation Safety Officer, acknowledged that NRC inspection findings were accurate. She reminded NRC that this event was self-identified and upon discovery, Crozer-Chester initiated appropriate corrective and preventative actions. She stated that one of the planned corrective actions includes installation of a new key-card access door with limited personnel access authorization, and once installed, this door will prevent this event from recurring. She emphasized that once she identified that the HDR was left unattended and unsecured from unauthorized removal, she stayed with the source and maintained constant surveillance until others were summoned to securely control and lock-up the source. She stated that it was very unlikely that the source could have been removed by an unauthorized person because the source was unattended for a very short period of time, the device is heavy and difficult to move, and hospital security measures for that area include a receptionist and video monitoring. Ms. Stockdale added that the Crozer-Chester Medical Center has a comprehensive and effective radiation safety program that enjoys strong management support, that past NRC inspection records confirm good performance, and this event was an isolated occurrence.

John Saunders, Crozer-Chester Chief Operating Officer, stated that the medical staff understands the importance of maintaining security control over NRC licensed radioactive sources and that corrective actions including installation of the new key card door and staff briefings will prevent any future violations.

Mr. John Wray provided closing comments on the enforcement policy and enforcement options available to the staff.

Mr. Costello thanked licensee representatives for their attendance and adjourned the meeting.

## LIST OF PERSONS ATTENDING

### Licensee

John Saunders, Chief Operating Officer  
William D. Powless, M.D., Medical Director  
Marie S. DeStefano, Administrative Director of Radiation Oncology  
Diana Stockdale, Radiation Safety Officer

### NRC

Francis Costello, Acting Director, Division of Nuclear Materials Safety  
Pamela Henderson, Chief, Medical Branch  
John Wray, Enforcement Specialist  
Karl Farrar, Regional Counsel  
Sally Merchant, Senior Enforcement Specialist, Office of Enforcement  
Randolph C. Ragland, Jr., Senior Health Physicist  
Christopher Hott, Health Physicist  
Sandra Gabriel, Senior Health Physicist  
Shirley Xu, Health Physicist  
Donna Janda, Health Physicist

### Public

Joseph Koshy, Health Physicist, Pennsylvania Department of Environmental Protection