

**Radiology Services of Northern Virginia
13870 Park Center Drive, Building #5
Herndon, VA 20171-3216**

January 7, 2007

James P. Dwyer, Chief
Commercial and R & D Branch
Nuclear Materials Safety Branch
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415

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REGION I
2007 JAN 19 AM 10:31

RE: "Reply to a Notice of Violation"
Radiology Services of Northern Virginia - Amendment Application
License Number: 45-31125-02MD
Docket Number: 03037208 /2006001

Dear Mr. Dwyer:

Pursuant to your correspondence date December 24, 2006, the following responses are submitted for review and acceptance. Each response will correspond to the items addressed in your "Notice of Violation".

- A. On September 19, 2006, Steven Courtemanche, NRC Region I offices, determined the individuals working in the restricted areas of this facility, had not been adequately instructed in the precautions and procedures required to minimize exposure received from radioactive materials. In addition, these employees revealed an inadequate knowledge of emergency procedures needed, in the event of an accident while transporting radiopharmaceuticals.

Following the inspector's visit, the following corrective action was employed to assure future compliance with applicable regulations, policies and procedures and license conditions.

1. Staff members preparing radioactive materials were observed by the radiation safety officer to assure their preparation techniques optimize radiation protection.

NMSS/RGNI MATERIALS-004

2. Refresher training was provided to the nuclear pharmacy staff to include the following topics:
 - a. Implementation of radiation protection techniques to include the concepts of time, distance and shielding.
 - b. A review of policy and procedures regarding ambient exposure and removable contamination testing. Training included the performance of surveys, licensing requirements, action trigger limits, documentation of survey results (manual and computer recording), RSO notifications, equipment calibrations, daily constancy testing, counting efficiency, mathematical conversion from counts per minutes to disintegrations per minutes and equipment trouble shooting.
 - c. A review of emergency procedures and implementation in the event of a radiation spill and/or an accident when transporting radioactive materials.
3. The radiation safety officer and radiation safety staff will re-evaluate the nuclear pharmacy staff members on a monthly basis to assure the refresher training remains effective. In the event, additional training is needed, it will implemented immediately by the radiation safety officer.

Following refresher training, it appears all pharmacy personnel have a better understanding of the items mentioned above. Full compliance has been achieved as of the date of this correspondence.

- B. On August 1, 2006, Steven Courtemanche, NRC Region I offices cited this licensee for failure to ensure the shipping papers were readily available in the driver's compartment as required in regulations addressed in 49 CFR 177.817 and 10 CFR 71.5(a).

1. Following the noted infraction, the policies and procedures regarding shipping papers were modified to assure compliance with regulations addressed in 49 CFR 177.817. Specific changes are documented below:
 - a. Shipping papers will be readily available to, and recognizable by, authorities in the event of an accident or inspection.

When the driver is at the vehicle's controls, the shipping papers shall be within his immediate reach while restrained by his seat belt. In addition, the shipping papers will be readily visible to a person entering the driver's compartment or in a holder which is mounted to the inside of the door on the driver's side of the vehicle.

When the driver is not at the controls of the vehicle, the shipping papers shall be in a holder mounted to the side of the door on the driver's side of the vehicle or the driver's seat in the vehicle.

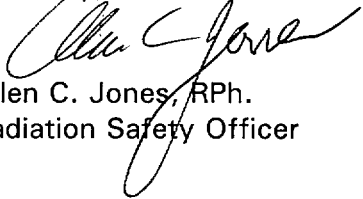
- b. All drivers have been instructed on the modified policy. Monthly reviews of the company vehicles will be conducted by the radiation safety staff to assure full compliance with NRC and DOT regulations and license conditions.

Full compliance has been achieved, as of the date of this correspondence.

If you require additional information regarding this response letter, please contact me for assistance.

We thank you in advance for your assistance with this "Notice of Violation" and Response submission.

Sincerely,

A handwritten signature in black ink, appearing to read "Allen C. Jones", written over the typed name and title.

Allen C. Jones, RPh.
Radiation Safety Officer