



# CJW Medical Center

Chippenham & Johnston-Willis

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2007 FEB 23 PM 1:19

Regional Administrator  
Division of Nuclear Materials Safety  
US NRC, Region 1

License No. 45-15249-01

RE: REPLY TO A NOTICE OF VIOLATION (Docket No. 030008805) / 2006001

Chippenham and Johnston Willis Hospital, Inc. are submitting the following information, in response to the NOTICE OF VIOLATION date January 5, 2007.

- In early 2005, the regional HCA hospitals purposed that all of the old calibration and check sources be collected and disposed of through one contractor. A list of all sources was compiled at each facility and a contractor selected. In May of 2005, our consultant Medical Physicist, Dr. Broga, pointed out State Regulations allow older Co-57 sources to be decayed in storage. If held for 10 half-lives and at measured background levels, such sources could be disposed of as regular waste. All of the Co-57 sources were disposed of through decay-in-storage in late May of 2005. Remaining sources were set aside for combined contracted waste pick-up that (a Johnston Willis) technologist believed would happen in June. Administrative problems delayed the contracted pick-up until February of 2006 and, for reasons that are not clear, the Johnston Willis sources were not collected. In May of 2005, all button and stick sources, designated for contract pick-up, were placed in a cardboard box located in the hot lab storage area. The two larger sources were left in lead-pigs. In June of 2006, a nuclear medicine technologist mistakenly thought this box of sources had been properly held for decayed and disposal. After monitoring the outside of the box, and finding no notable difference from background, the technologist disposed of the sources in the solid waste.

The sealed source inventory has been verified and all documentation has been corrected. The technologist involved has been counseled with regard to how the incident occurred, what process should have been followed and has reviewed the departmental waste disposal policy with the departmental supervisor.

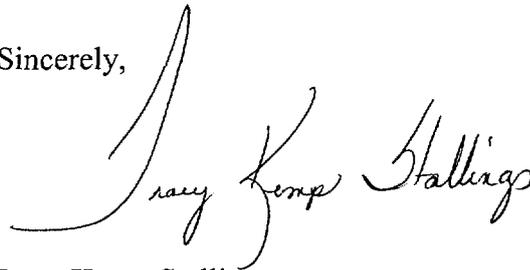
**NMSS/RGNI MATERIALS-004**

An educational in-service was conducted with the staff of the Nuclear Medicine department reviewing the departmental waste disposal policy. The policy requirement that sealed source with half-lives less than 120 days must be held for 10 half-lives and must measure below background before being disposed of was clearly delineated.

Full compliance was achieved as of January 2007.

If you have any question regarding this response, please contact Sue DeVincent.

Sincerely,

A handwritten signature in cursive script that reads "Tracy Kemp Stallings". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Tracy Kemp Stallings  
Chief Operating Officer  
CJW Medical Center – Johnston-Willis Campus  
1401 Johnston-Willis Drive  
Richmond, VA 23235-4044

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

Gerry Reece, M.D.  
CJW Medical Center  
Radiation Safety Officer