



**GARDEN STATE VETERINARY SPECIALISTS**  
*by Veterinarian Referral Only*

James P. Dwyer, Chief  
Commercial and R & D Branch  
Division of Nuclear Medicine Safety  
United States Nuclear Regulatory Commission  
Region 1  
473 Allendale Road  
King of Prussia, Pennsylvania 19408-1415

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RECEIVED  
REGION 1

SURGERY



INTERNAL MEDICINE



EMERGENCY/CRITICAL CARE



NEUROLOGY/NEUROSURGERY



OPHTHALMOLOGY



DERMATOLOGY



CARDIOLOGY



RADIOIODINE I-131



ON-SITE DIAGNOSTIC IMAGING

Ref: Inspection 03035729/2007001. Garden State Veterinary Specialists

Tinton Falls, NJ and Notice of Violations of April 4, 2007  
License No.: 29-30641-01  
Reply to Notice of Violations

Dear Mr. Dwyer,

We acknowledge receipt of your letter of April 4, 2007 and the accompanying Notice of Violations.

**Violation A:**

10 CFR 20. 1301. (a) (2) requires each licensee to conduct operations so that the dose in the unrestricted area from external sources does not exceed 0.002 rem (0.02 millisievert) in any one hour.

Contrary to the above, the inspector measured an exposure rate of 0.005 rem (0.05 millisievert) per hour at the outer surface of the front door to the waste storage shed, located in an unrestricted area.

**Our Response:**

It was a mistake or oversight to move decaying waste with exposure rate higher than 0.002 rem from restricted area to an unrestricted area, the outside storage shed. This mistake happened because we ran out of storage capacity for decay in storage waste. We have ordered one more lead lined container for storing waste contaminated with I-131. The addition of this extra lead-lined container should prevent the measurement in the unrestricted area from exceeding the 0.002 rem level. The waste will be decayed for at least 10 half lives from the date it is put in decay in storage container. Before discarding as ordinary waste each bag of waste will be monitored outside the shielded storage container and surveyed with the survey meter. Discard as in house waste only those containers (bags containing decaying waste) that cannot be distinguished from background radiation levels.

*Compassionate  
Care*

**NMSS/RGNI MATERIALS-004**



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Record the date on which the container was sealed, the disposal date and type of material (e.g. paraphernalia, unused dosages, etc.). Check to be sure all radiation labels have been obliterated. Containers that can be distinguished from the background radiation levels must be returned to storage area for further decay.

### Violation B:

Condition 16 of the above listed license requires, in part, that the licensee conduct its program in accordance with procedures contained in the licensee's letter dated February 3, 2003. The February 3, 2003 letter states that it is the policy that personnel involved in I-131 mCi cat therapy procedures shall have bioassay evaluations performed on a regular basis.

Contrary to the above, during 2006 and 2007 bioassay evaluations were not performed for personnel involved in I-131 procedures.

### Our Response:

Recently we purchased a Capintec Model 3000 thyroid uptake probe and well counter combination for bioassay evaluations of personnel handling I-131 cat therapy procedures. This counter gives the activity of bioassay results in nanocuries. The results can be printed on hard copy and also stored in counter's database.

### Violation C:

10 CFR 20.1501 9a) requires that a licensee shall make to cause to be made, surveys that (1) may be necessary for the licensee to comply with the regulations in this part; and (2) are reasonable under the circumstances to evaluate the magnitude and extent of radiation levels, the concentrations or quantities of radioactive material, and the potential radiological hazards.

10 CFR 20.1906 (b) (1) requires that each licensee shall monitor the external surfaces of a labeled package for radioactive contamination. 10CFR 20.1906 (e) requires that each licensee shall establish, maintain, and retain written procedures for safely opening packages in which radioactive material is received, and ensure that the procedures are followed.

Contrary to the above, since at least January 1, 2006, labeled packages received containing I-131 were improperly surveyed using a procedure containing errors which resulted in inaccurate and incomplete monitoring for radioactive contamination.

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## Our Response:

We have modified our procedure (copy attached) for opening I-131 packages, surveying and monitoring for radioactive contamination. Packages are surveyed using calibrated Ludlum Model 14c survey meter with pancake probe. The monitoring for radioactive contamination will be done using calibrated Capintec Model 3000 well counter. This equipment converts c.p.m. to d.p.m. and stores the results in its database. We have modified our record keeping form to comply with record keeping requirements.

## Violation D:

10CFR 20.1101(c) requires that the licensee shall periodically (at least annually) review the radiation protection program content and implementation.

Contrary to the above, since March 2002 the licensee had not performed any reviews of the radiation protection program content and implementation.

## Our Response:

It was an oversight on our part that we did not review our radiation protection program. However, we are confident that after the implementation of the corrective actions we have planned to take will help us to comply with the NRC regulations and given us a chance to resume our I-131 cat therapy procedures will give us a chance to demonstrate that we are in compliance with the regulations and we will submit a review of our radiation protection program to the NRC office.

We will appreciate any suggestions and guidance your office will provide us in implementing our corrective actions. Thank you very much for your kind consideration and cooperation.

Sincerely,

Thomas D. Scavelli, D.V.M., Diplomate American College of  
Veterinary Surgeons  
Director of GSVS  
Radiation Safety Officer