

LICENSE NO: 37-00147-03

DOCKET NO. (s) 030-2887

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ATTACHED

- Appendix A
- Appendix B
- Appendix C
- Memo

INSPECTION REPORT NO. 87-001
PAUL S. FRIEDMAN, M.D.
1422 CHESTNUT STREET
PHILADELPHIA, PA 19102

LICENSEE CONTACT: DAVE BRYANT, NMT Telephone No: 215-564-2163

LICENSE NO: 37-00147-03 CATEGORY G PRIORITY: 3

CATEGORY _____ PRIORITY: _____

CATEGORY _____ PRIORITY: _____

INSPECTION DATE (s): ~~9/90~~ 9/25/87 TYPE OF INSPECTION: SPECIAL ANNOUNCED
 ROUTINE UNANNOUNCED
 DAYSHIFT
 OTHER

SUMMARY OF FINDINGS AND ACTION

- NO NONCOMPLIANCE, CLEAR 591 ISSUED
- NO NONCOMPLIANCE, LETTER
- NONCOMPLIANCE, APPENDIX A
- ACTION ON PREVIOUS NONCOMPLIANCE, APPENDIX B
- NONCOMPLIANCE, 591 ISSUED
- SUPPLEMENTAL INFO, APPENDIX C

RECOMMENDATIONS
SEE BASIS IN APPENDIX C

CHANGE CATEGORY TO: _____ CHANGE PRIORITY TO: _____
 NEXT INSPECTION DATE: 9/90

PERSONS CONTACTED

DAVE BRYANT, NMT
DR. FRIEDMAN, RSO

INSPECTOR: [Signature]
 APPROVED: [Signature]

B/11
11/20/87

INSPECTION PLAN AND REPORT NUMBER _____ Page _____ of _____

Plan Approved: _____ Date: _____

Licensee: _____ License No. _____

Inspection Items	Scheduled for Inspection	Post Inspection Status	Module No.
Management Meeting - Entrance and Exit Interviews (Required)			30703B
Program Requirements, MC 2860 (Required)			78710B
Followup on Noncompliance and Deviations			92702B
Independent Inspection Effort (Required)			92706B
Transportation			86740B

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78710B - Medical

AREAS INSPECTED AND FINDINGS

Licensee: PAUL S. FRIEDMAN, M.D. License No: 37-0047-03 Amendment No: _____
RADIOLOGY ASSOCIATES

INSPECTION ITEMS	CRITERIA	FINDING
1. <u>Organization</u>	Lic Cond _____	C
Structure of organization as described in requirements?	1-2 PTS. SCANNED / MONTH	
Scope of Program? Patient load?	Tc-99m UNIT DOSES + I-131 CAPS FOR	
NOTES & REMARKS:	THYROID SCANS	
2. <u>Licensee Internal Audits</u>	Lic Cond _____	C
Scope and frequency of audits as required?	SEMI-ANNUAL QUARTERLY	AUDITS PERFORMED BY
Conducted by appropriate persons?	NPI AS PER AGREEMENT FROM PREVIOUS INSPECTION. DR. FRIEDMAN + TECH FIND	
Records maintained?		
Reviewed by management?		
Deficiencies identified and corrected?	THE AUDIT EXTREMELY HELPFUL. AUDITOR	
NOTES & REMARKS:	IDENTIFIES DEFICIENCIES + ITEMS OF NON-COMPLIANCE + FOLLOWS UP CORRECTIVE ACTION.	
3. <u>Training and Qualification of Personnel</u>	Lic Cond _____	C
Training & retraining conducted as required?		
Written & oral exams conducted?		IN-SERVICE PROVIDED TO NMT + ENTIRE STAFF BY NPI AUDITOR, ANNUALLY.
Examination results reviewed by management?		
Instructions to workers per 19.12?	19.12	
Authorized users? On license? Available in emergency?	Lic Cond _____	
NOTES & REMARKS:		
4. <u>Radiation Protection Procedures</u>	Lic Cond _____	C
Procedures available and implemented? Identify radiopharmaceutical and dose(s)? Cover handling of patients receiving therapeutic doses? Cover handling of cadavers?		
Close out Surveys on Patients receiving temporary implants?	35.14 (b)(5)(v)	
Emergency procedures for spills, etc? Personnel understand procedures?		
NOTES & REMARKS:		

AREAS INSPECTED AND FINDINGS

Licensee: _____ License No: _____ Amendment No: _____

INSPECTION ITEM	CRITERIA	FINDING
5. Use of Materials		
Procurement and use as required? Authorized form & route of administration? Special tests (moly breakthrough, leak tests, etc) required?	35.14(b) 35.14(b)(4)	<u>C</u> DOSE CALIBRATOR TESTS PERFORMED AT PROPER FREQUENCY
Inventory of brachytherapy sources?	35.14(b)(5)	
Dose calibration checks performed?		
Posting & labeling as required?	20.203	
NOTES & REMARKS:		
6. Storage of Materials		
Material secured in both restricted and unrestricted areas? Adequately?	20.207	<u>C</u> SEALED SOURCE STORED IN LOCKED STRONG BOX
NOTES & REMARKS:		
7. Facilities		
As described in lic cond or application?	Lic Cond _____	<u>C</u>
Any changes made? Adequacy?		
NOTES & REMARKS:		
8. Instruments		
Survey meters & instruments adequate for program?	Lic Cond _____	<u>C</u>
Instruments & meters operable? Calibrated? Calibration adequate?		SURVEY METER CALIBRATED & OPERABLE
NOTES & REMARKS:		

AREAS INSPECTED AND FINDINGS

Licensee: _____ License No: _____ Amendment No: _____

INSPECTION ITEM	CRITERIA	FINDING
<u>12. Effluent Controls, Waste Disposal</u>		
Release of effluents controlled? (particularly Xe-133, radioiodine where used)	20.106, 20.33	<u>C</u> - WASTE RETURNED TO SYNCOR
Waste disposals controlled?	20.301, 20.303, 20.304, 20.305	
Procedures, records maintained?	20.401, Lic Cond _____	
Surveys made? Adequate?	20.401	
NOTES & REMARKS:		
<u>13. Notifications and Reports</u>		
To individuals?	19.13	<u>C</u>
Overexposures, excessive levels & concentrations, incidents?	20.403, 20.405	
Personnel exposures and monitoring, termination reports?	20.407, 20.408	
Theft or loss of licensed material?	20.402	
Misadministrations?	35.41-35.45	
NOTES & REMARKS:		
<u>14. Posting of Notices</u>		
Part 20, license & documents, procedures, notice of violations posted?	19.11(a)	<u>C</u>
NRC-3 posted?	19.11(c)	
NOTES & REMARKS:		
<u>15. Other License Conditions</u>		

AREAS INSPECTED AND FINDINGS

Licensee: _____ License No: _____ Amendment No: _____

INSPECTION ITEMS	CRITERIA	FINDING
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16. Confirmatory Measurements

NRC Instrument: _____

Calibration Due Date: _____

17. Independent Inspection Effort

18. Incidents and Events

Any incidents of misadministrations, contamination, etc., not otherwise covered by reports?

35.41 -35.45
20.402, 20.403, 20.405

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APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: PAUL S. FRIEDMAN, M.D.

License No: 37-00147-03

Reference	Basis for noncompliance
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	CLEAR
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	

APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: PAUL S. FRIEDMAN, M.D.

License No: 37-00147-03

Identification and summary of action taken	Status
<p>Report No: <u>85-01</u> Type n/c: <u> </u> Describe: <u>INADEQUATE TRAINING</u></p> <p>Action taken: THE INSPECTOR INTERVIEWED THE NUCLEAR MED. TECH. WHO INDICATED ADEQUATE KNOWLEDGE OF PROCEDURE + LICENSE CONDITIONS. THE INSPECTOR REVIEWED RECORDS DOCUMENTING NUC. MED. IN-SERVICE PERFORMED BY NPI AUDITOR.</p>	<p>OPEN CLOSED</p>
<p>Report No: <u>85-01</u> Type n/c: <u> </u> Describe: <u>FAILURE TO PERFORM LEAK TEST</u></p> <p>Action taken: THE INSPECTOR REVIEWED RECORDS THAT INDICATED THAT LEAK TESTS OF SEALED SOURCES HAD BEEN PERFORMED AT PROPER INTERVALS BY LICENSEE CONTRACT CONSULTANT, NPI.</p>	<p>OPEN CLOSED</p>
<p>Report No: <u>85-01</u> Type n/c: <u> </u> Describe: <u>FAILURE TO CALIBRATE SURVEY METER</u></p> <p>Action taken: THE INSPECTOR REVIEWED RECORDS THAT INDICATED THAT THE LICENSEES SURVEY METER HAD BEEN CALIBRATED AT THE PROPER FREQUENCY</p>	<p>OPEN CLOSED</p>
<p>Report No: <u>85-01</u> Type n/c: <u> </u> Describe: <u>FAILURE TO PERFORM CONSTANCY TEST</u></p> <p>Action taken: THE INSPECTOR REVIEWED RECORDS THAT INDICATED THAT THE DAILY CONSTANCY TEST OF THE DOSE CALIBRATOR HAD BEEN PERFORMED ON EACH DAY THAT PATIENT DOSES HAD BEEN ASSAYED.</p>	<p>OPEN CLOSED</p>
<p>Report No: <u>85-01</u> Type n/c: <u> </u> Describe: <u>FAILURE TO PERFORM LINEARITY TEST</u></p> <p>Action taken: THE INSPECTOR REVIEWED RECORDS THAT INDICATED THAT A LINEARITY TEST HAD BEEN PERFORMED ON THE DOSE CALIBRATOR AT THE PROPER FREQUENCY</p>	<p>OPEN CLOSED</p>
<p>Report No: <u>85-01</u> Type n/c: <u> </u> Describe: <u>FAILURE TO PERFORM RADIATION SURVEYS</u></p> <p>Action taken: THE INSPECTOR REVIEWED RECORDS THAT INDICATED THAT "WEEKLY" RADIATION SURVEYS HAVE BEEN PERFORMED AFTER EACH USE OF LICENSED MATERIAL</p>	<p>OPEN CLOSED</p>

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APPENDIX C - SUPPLEMENTARY INFORMATION

Licensee: Paul S. Friedman, M.D.License No: 37-00147-03

- () Uncorrected/repeated noncompliance
 () Unusual occurrence, conditions, etc
 () Basis for change of Category or Priority
 () Unresolved items
 () Inspector's comments

~~Audit~~ ~~Semi-Annual~~ ^{Quarterly} AUDITS HAVE HAD A POSITIVE IMPACT ON LICENSEE'S PROGRAM. LICENSEE STATED THAT THEY WISH TO CONTINUE THE AUDIT PROGRAM. I will put a PARAGRAPH IN INSPECTION LETTER STATING THAT THEIR COMMITMENT CONCERNING THIS AUDIT PROGRAM, WITH THE NRC HAS BEEN FULFILLED AND THAT THEY SHOULD NOT CONSIDER THEMSELVES UNDER THIS OBLIGATION ANY LONGER.