

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

April 26, 2007

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REGION I
2007 MAY 11 AM 10:35

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

RE: "Reply to a Notice of Violation"
Radiology Services of Northern Virginia - Amendment Application
License Number: 45-31125-02MD
Docket Number: 03037208 / 2007004

Dear Mr. Dwyer:

Pursuant to your correspondence date April 13, 2007, the following responses are submitted for review and acceptance. Each response will correspond to the items addressed in your "Notice of Violation".

- A. On March 20, 2007, Steven Courtemanche, NRC Region I offices, concluded his follow-up visit and determined, that 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. In addition, they failed to account for the counting efficiency of the instruments used for removable contamination analysis..

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

1. Refresher training was provided to the nuclear pharmacy staff to include the following topics:

NMSS/RGNI MATERIALS-004

- a. Implementation of radiation protection techniques when preparing radioactive materials, to specifically include the concepts of time, distance and shielding.
 - b. Policy and procedures related to ambient exposure and removable contamination testing, were reviewed with all personnel involved in these procedures. Specific 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 accidents when transporting radioactive materials.
 - d. Package receipt/return procedures; DOT shipping requirements; driver's responsibilities and placement of shipping papers in the transport vehicle.
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 and/or medical physics consultant.

At the time of the March 20, 2007 visit, several new employees had recently joined the nuclear pharmacy staff. The radiation safety staff were in the process of providing radiation safety and Department of Transportation (DOT) training as well as orientation to nuclear pharmacy operations. As of the date of this letter, all personnel working at this licensed facility have been provided the required training.

- 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.

A posted reminder will be placed in each transport vehicle. This posting is designed to remind the pharmacy driver that the clipboard (holding the shipping papers) will be placed in the driver's seat, when the vehicle is vacated.

- 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,



Allen C. Jones, RPh.
Radiation Safety Officer