

REPLY TO NOTICE OF VIOLATION

April 23, 2008

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC

Docket No. 03002941
License No. 37-00148-06

Sir/Madam:

This is in response to the Notice of Violation dated March 27, 2008, related to insufficient labeling of several waste containers in our Nuclear Medicine and Research waste storage locations.

1. **(Reason For Violation)** In the Nuclear Medicine location, the lack of labeling on the containers in question was a basic oversight. This had gone unrecognized largely because the containers were within a labeled location and staff with access were well aware of the use of these containers (i.e., collection of short/medium/long-lived radwaste generated daily in the clinical area). In the research storage location, the violation stemmed from a combination of staff not strictly adhering to established procedures and/or not fully understanding those procedures. In some cases, records related to waste container content were being kept in a manner such that they were not readily available.
2. **(Corrective Measures)** Appropriate labels were placed on the Nuclear Medicine containers at the time of the NRC inspection. The containers in the research waste area have been examined, sorted, and cross-checked for content against all available records with the result that all containers are now fully labeled with radionuclide identity and activity information, as well as other sufficient information to permit personnel handling or using the containers, or working in their vicinity, to take precautions to minimize exposure.

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3. **(Actions To Prevent Recurrence)** Preventive action taken include:

- a. Re-education of relevant staff members in the appropriate procedures and requirements for labeling waste and other radioactive containers.
- b. Initiation of additional audits and inspections of the storage areas by the RSO and Senior Health Physicist, with focus on proper labeling and record-keeping.

4. **(Date Full Compliance Will Be Achieved)** We believe that we are currently in full compliance.

Please contact our Radiation Safety Officer, Mr. John Keklak at 215-955-7813 if you require any additional information

Sincerely



Kimberly J. Evans
Vice President for Clinical and
Support Services

C: Mr. John Keklak
Dr. Dennis Leeper
Regional Administrator, NRC Region I