

FAX

To: Penny Lanzisera
From: Catherine Perham
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Pages: 5 including this cover
Phone: 610-337-5169
Date: ~~2-27-2009~~ 03/19/2009
Re: Rad Onc Written Directive
CC:

Urgent For Review Please Comment Please Reply Please Recycle

Comments:

Dear Ms. Lansisera,

Here is the additional information from Radiation Oncology and Medical Physics, who also interviewed Dr. Snyder, the physician who signed the Written Directive.

Thank you for your kind consideration of these documents.

(Enclosures)

Sincerely,



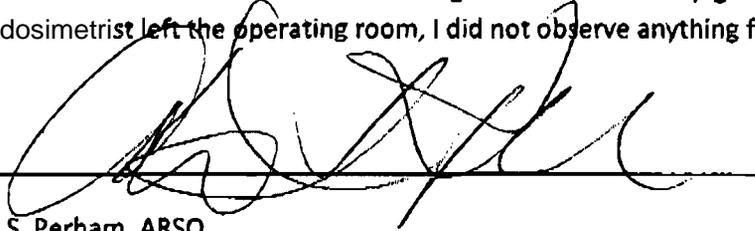
Catherine S. Perham ARSO, University of Virginia Environmental Health and Safety Office

2.27.2009

Attestation; Catherine S. Perham, ARSO

I attest that I was present at the surgery under investigation, during that portion of the procedure that the radioactive sources were present in the operating room, in a Radiation Safety supervisory capacity. I will attest that I observed Or. Snyder inspecting the excision, inquiring of **the** dosimetrist as to the individual source strength received, and determine the number of sources (**seeds**) that were needed to achieve his desired dose of 100 Gy. The sources were then counted; including the cutting of a ribbon of seeds to meet the desired number, and the strands were incorporated into a mesh. **The physician then** implanted the mesh into the patient, and the remaining sources (seeds) were counted in the operating room to ensure that **all** were accounted for, minus the number implanted. The operating room was surveyed using a GM meter immediately after implantation and seed count to confirm that no seeds had **strayed, then the dosimetrist took the remaining seeds in their lead pig to the source storage room.** After the dosimetrist **left the operating room, I did not observe anything further to do with the sources.**

Signed: _____



03/17/2009

Catherine S. Perham, ARSO

University of Virginia Environmental Health and Safety Office

Explanation of additional information:

The physicists wish to note that the regulation 10 CFR 35.40 Written directives, section (b) number (6) (ii) states that: " After implantation but before completion of the procedure: the radionuclide, **treatment** site, number of sources, and total source strength and exposure time (or the total dose)." Dr. Snyder used the provision "or the total dose" in this procedure. As he successfully implanted the number of sources that he calculated were needed to give the prescribed dose of 100 Gy, (see attestation) he did not alter the original written directive which includes the total dose.

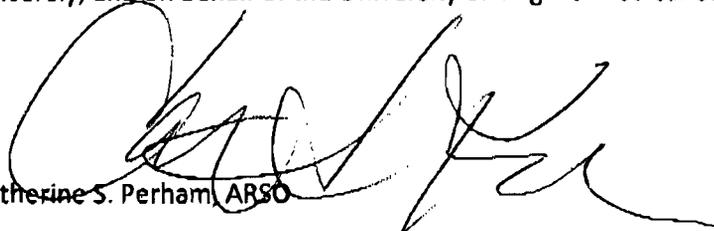
I have included the original packing list for the seeds ordered for this procedure, and the computer log of the seeds counted and calibrated pre- and post- implant. This accounting takes place in the Radiation Oncology hot lab or source storage room, and confirms that the physician did indeed implant the seeds he desired for the dose prescribed. The unused seeds were logged during the patient's **hospital** stay.

It is UVA Medical Center protocol to amend the original written directive for this type of brachytherapy "(6) For all other brachytherapy, including low, medium, and pulsed dose rate remote afterloaders:" only if there is a deviation from the original plan due to anatomy or other unforeseen irregularity. In all aspects, this **brachytherapy**, although unusual, was performed according to long-established protocol and did not deviate from them.

In order to prevent a recurrence of a misplaced or improperly filled out written directive, and to ensure that all written directives are filled out to our usual standards, Radiation Oncology Medical Physicists are developing a checklist to ensure that all paperwork *is* complete and is double-checked, and also that it is scanned into the patient's electronic chart, as we explained before. Your inspection has brought to **light** some weaknesses, and we are working to strengthen our program

Thank you for allowing us this forum. We hope you will consider our information.

Sincerely, and on behalf of the University of Virginia Medical Center,


Catherine S. Perham, ARSO

