

May 1, 2009

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Re: Reply to Notice of Violation (dated April 8, 2009)

In response to the NRC Routine Inspection Report No. 030-02286/2009-01 (DNMS) dated April 8, 2009, Saint Luke's Hospital of Kansas City (SLH) accepts the findings of violations of 10 CFR 35.41(a) and 10 CFR 35.40(b)(1). Response to the listed violations is as follows:

A. Licensee did not fully implement written procedures to provide high confidence that each administration is in accordance with the written directive.

1. The reason for the violation was that the Authorized User and Dosimetrist involved in the cases cited were planning source removal times for both cases. The Dosimetrist inappropriately recorded those planned times in the actual Removal Time section of the form.
2. Corrective actions that have been taken include retraining of all Authorized Medical Physicists and Dosimetrists. Staff were reminded to follow the written procedures and not complete removal dates and times prior to source removal.
3. Corrective steps taken to prevent future violations include modification of the written procedures to be more specific regarding when implant/removal times are to be recorded. The form was also modified to include a reminder in the section of concern.
4. Full implementation of these corrective actions achieved May 4, 2009.

B. Written directives did not include the units of radioactivity to be administered to patients.

1. Reason for violation was a change in the form used for the written directive, which added an option for microcuries which had not been on the previous form and required the correct unit to be circled. The

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Technologists and Authorized Users neglected to circle the units as microcurie level administrations are not performed.

2. Corrective actions that have been taken include retraining of Technologists and Authorized Users to ensure they complete the written directive in accordance with the written procedures.
3. To prevent future violations, the written directive form was revised to remove the microcurie option, as it is not needed.
4. Full compliance was achieved on May 4, 2009.

We believe that the corrective actions we have taken will allow us to ensure that written procedures are fully implemented and written directives are fully completed as required.

If you have any questions or require additional information, please feel free to contact SLH RSO Greg Sackett at (816) 932-6296 or gsackett@saint-lukes.org.

Regards,



Kevin Thorpe
Vice President, SLH

Cc: Regional Administrator, NRC Region III