



CENTRAL MONTANA MEDICAL CENTER

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November 17, 2010

U.S. Nuclear Regulatory Commission

Region IV

ATTN: Vivian H. Campbell, Chief Nuclear Materials Safety Branch A

612 East Lamar Blvd., Suite 400

Arlington, Texas 76011-4125

November 17, 2010

SUBJECT: Reply to a Notice of Violation

Dear Ms. Campbell:

We are responding to your letter in reference to the inspection conducted on September 23, 2010 at our facility. We understand that we were in violation of the NRC policy of safe use of radiopharmaceuticals, when licensed personnel failed to wear personal monitory devices at all times where radioactive materials are used or stored. This is a severity Level IV violation.

We have taken the following corrective action as follows:

1) The root cause of the problem was the monitoring badge and ring were not in conspicuous and consistent location to remind the employee to put them on upon entering the area. The policy & procedure for safe use of radiopharmaceuticals has been reviewed by staff with special attention to Monitoring Radiation Exposure which is addressed in the policy under section E as follows:

1. Monitoring Badges. A film Badge will be furnished by the medical center to all persons working in area where ionizing radiation physicist.
 - a. Whole Body Exposure Monitoring Needs. The ICN Type 11 badge shall be worn inside the lead apron at the waist level to monitor whole body exposure.
 - b. Finger TLD Badge. At the discretion of the radiation physicist, a finger TLD badge will be assigned in addition to whole body film badges by persons preparing radionuclides, or injecting radionuclides for imaging.
 - c. Waist-Level Badges. Waist-level badges will be provided to pregnant workers assigned to vascular/interventional procedures, cardiac cath

lab, or nuclear medicine. Those employees should declare their pregnancy to the RSO so that fetal exposure can be monitored.

2) We have discussed the failure in the department, so all employees are reminded and aware of the importance of monitoring devices, and will remind each other to wear them.

a) In-service education on the policy and procedure was given on September 24, 2010.

3) Whole body badges and rings have been placed in a location that will trigger proper wearing of the devices.

4) These corrective actions were implemented on September 24, 2010 by the RSO (Dr. Hingle) and have been successful.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Faulkner', written in a cursive style.

David Faulkner, CEO