

## Actions Taken to Prevent Recurrence Amendment

1. All medical physicists providing brachytherapy at Memorial Healthcare and the Radiation Oncologists performing brachytherapy at Memorial will receive the following education prior to June 13, 2011 and annually thereafter.
2. Education will be completed by 1:1 interactions and will be done by the Director of Ambulatory Services with the Medical Physicist.
3. Documentation of education completion will be documented for each person identified in #1 and kept on file with a copy submitted to the Director of Ambulatory Services.
4. The education will include:
  - a. Definition of medical events as written in NRC Regulation 35.3045, 1-3.
  - b. Education will include recognizing doses <80% or >120% (+/- 20%) of prescribed treatment level as medical events.
  - c. When a medical event occurs, the person who identified it will notify the Radiation Oncologist. The Radiation Oncologist will then notify Memorial Healthcare administration and the Radiation Safety Officer for Memorial Healthcare.
  - d. Memorial Healthcare administration will collaborate with the Radiation Safety Officer and the Radiation Oncologist and the event will be reported.
  - e. When there is a question whether an occurrence meets the criteria for a medical event, it will be reported.
  - f. When a medical event occurs it will be reported to the NRC Operation Center by telephone no later than the next calendar day after discovery of the medical event. A written report will follow within 15 days after the discovery of the medical event.
  - g. It is recognized that NRC inspectors can not offer an official interpretation of regulations. Those requests would need to go to the NRC legal department.