

CATS



*"Exclusively Feline
Appointment Only"*

VETERINARY
AND RADIO-IODINE
TREATMENT CENTERS

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February 8, 2012

US NRC
Materials Licensing Branch
US Nuclear Regulatory commission, Region III
2443 Warrenville Road, Ste 210
Lisle, IL 60532-4352

RE: 2nd REPLY TO A NOTICE OF VIOLATION NRC Inspection Reportion 030-33367/11-01 (DNMS) and notice of violation

Thank you for the phone conversation to help clarify some outstanding issues, and acknowledgement of our original response.

- 1) We performed the noted inservices for staff by the end of October of 2011 as we noted we would. A copy of the sign in sheets are attached.
- 2) We adjust our Survey Policy to clarify the posting, and the fact the policy is for all employees, not just new employees. A copy of the updated policy is attached.

We believe this resolves any outstanding issue.

If there are any questions, please contact Laura T. Smith, physicist at 586 215-5947, pager 313 609-2038 or Dr. Dan H. Marshall DVM, at 586-463-9550.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan H. Marshall". The signature is fluid and cursive, with a large loop at the end.

Dan H. Marshall, DVM
Radiation Safety Officer

Cats Radioactive room surveys

PURPOSE

To assure that employees are familiar with the appropriate radiation safety policies and procedures with end of day surveys and weekly wipe testing for removable contamination in Cat Nuclear areas.

POLICY

Ambient Dose Rate Surveys

1. Survey Areas
 - a. In Radiopharmaceutical areas at the end of each day of use with a radiation detection survey meter.
 - b. In Radiopharmaceutical storage areas – survey weekly.
2. Immediately notify the RSO if you find unexpectedly high survey levels, and assess wipe testing procedures to assess if contamination or ambient exposures.
3. If exposure rates are over 5mrem/hour at 30cm from any area – a secondary posting sign will be posted outside the door noting: Caution Radiation Area. Once levels of exposure drop below the 5mrem/hour at 30cm level, the Caution Radiation Area sign will be removed. At all times the Caution Radioactive Materials sign will remain posted.

Before commencing work with Nuclear employees will receive instruction to advise them of radiation safety policies and procedures, as apply to wipe testing and removable contamination surveys.

Removable Contamination Surveys

Weekly departmental wipes are required at the end of the working week. (example: If Thursday and Friday are holidays, and no radioactive cats are present at facility, then the weekly wipe will be performed on Wednesday – if unsure, ask Dr. Marshall or physicist). Wipes are also required if a spill occurs to clarify removable contamination. Wipes may be done on a more frequent basis, if wanted, but not required. When performing wipes, the wipe test counter QC must have been completed for that day.

Additional required wipe testing includes (see these policies for reference):

- Package Wipes, and hot lab waste storage areas
- Locations where Iodine-131 administrations occur.

Wipe testing survey areas:

1. In areas indicated by the facility map, administration areas, survey at end of work week for removable contamination. If diagnostic administrations are occasionally made in patients' rooms and special care is taken to remove all paraphernalias, those rooms need not be surveyed.

2. The wipe sample **must cover an area of minimum 300cm²**. The assay procedure should be sufficiently sensitive to detect the presence of 200 dpm/100 cm² of removable contamination iodine. You must document the sample measurements (usually in counts per minute, cpm) to disintegrations per minute, dpm. This can be done by pushing the DISPLAY button – two times to the dpm screen. If you are unsure of this, you must ask.
3. Immediately notify the RSO if you find unexpectedly high levels, and start spill procedures.

Responsible Persons: Medical Physicist, Administrative Director, Managers, Technologists

REVIEW SHEET

DATES UPDATED

July 2011, February 2012

REVIEWED / REVISED BY

Laura T. Smith, physicist

Jeff Dye - Linda Gull

Breanna Armstrong

Stacy Baker

Ja M. Noel

Amy Demer

~~Trish~~

Dana Walker

~~W. O.~~

~~SS~~

Insa Stratton

Cathy

Erin Bush

Marie

Radiation Safety

10/19/2011

Intros

Jim Wernon

Tommy Leonard

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