



December 17, 2015

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

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Subject: Reply to a Notice of Violation
NRC License No. 53-27797-01
Docket No. 030-36775

A. Violation Identified

Contrary to 10 CFR 20.1906(c), the licensee failed to perform the monitoring required by 10 CFR 20.1906(b) as soon as practical after receipt of the package, but not later than three hours after the packages were received at the licensee's facility. Specifically, during the licensee's normal working hours on October 27, 2015, the licensee received three Yellow II labeled packages that required monitoring in accordance with 10 CFR 20.1906(b). These packages were not monitored until the following day on October 28, 2015.

Licensee Response

We do not dispute this violation.

1. Reason for Violation:

The packages in question are shipped to a surgical center, and are normally received at times when the Medical Physics staff is not on site. The procedure was to perform these surveys the following day when the Medical Physicist was on site to inspect the shipment. Since the packages were received at times when the Medical Physicist was not working on site, we had considered the packages to have been delivered "after normal working hours", and we believed we were complying with 10 CFR 20.1906(c) by surveying within 3 hours after the Medical Physicist was on site the following day.

2. Immediate Corrective Action:

For all labeled packages received since the inspection, the Medical Physicist has performed the required package surveys within 3 hours of receipt. The Medical Physicist receives notification from the supplier of the expected delivery date. The surgical center staff contacts the Medical Physicist immediately after the package is delivered, and the Medical Physicist or other trained individual performs the survey within 3 hours.

3. Corrective Action to Prevent Recurrence:

The Medical Physics and surgical center staff have been informed of the need to perform these surveys within 3 hours. Procedures have been modified to ensure the surveys are performed. Additional survey equipment will be purchased, and the surgical center staff will be trained to perform the required surveys when Medical Physics staff is unavailable.

4. Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 29, 2015.

Thank you for drawing attention to these safety issues, and giving us an opportunity to correct them. We will ensure that such violations are not repeated.

Sincerely,

A handwritten signature in black ink, appearing to read "Laeton J. Pang". The signature is written in a cursive style with a horizontal line extending from the end.

Laeton J. Pang, M.D., M.P.H.
Medical Director

Cc: Regional Administrator, Region IV