



St. Peter's Hospital

2475 Broadway • Helena, Montana 59601 • Phone: (406) 442-2480 • www.stpetes.org

Reply to a Notice of Violation

May 26, 2017

Docket No. 030-10917

License No. 25-12453-02

US Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Regional Administrator, Region IV
1600 E. Lamar Blvd
Arlington, Texas 76011

1. Reason for the violation: Our team did not ensure that the written directives contained the required information for seed implants. For the pre-implant written directive, our practice included the physician's review and approval of the plan and his decision regarding the dose, radionuclide and number of seeds to be implanted. However, this was not properly documented according to NRC rules. For the post-implant written directive, our team recognized that the documentation contained in the supporting plan paperwork indicated approval by the physician for the number of sources, total source strength and total dose. However, this information should have been present in the signed written directive.
2. Corrective steps that have been taken and the results achieved:
 - a. Steps taken: The policy was changed to include the following language:
 - i. A pre-procedure Written Directive will be completed and signed by the Radiation Oncologist before implantation. The Written Directive will include 1) the treatment site, 2) the radionuclide and 3) the dose.
 - ii. A post-procedure Written Directive will be completed and signed by the Radiation Oncologist after implantation but before completion of the procedure. The Written Directive will include 1) the radionuclide, 2) the treatment site, 3) the number of sources, 4) the total source strength and 5) the total dose.
 - b. Results achieved: No seed implants have occurred since the inspection. Results will be evaluated for future seed implants.
3. Corrective steps that will be taken: All corrective steps have been taken.
4. Date when full compliance will be achieved: May 26, 2017.

Sincerely,

Jefferson Fairbanks, PhD, Radiation Safety Officer, fairbanj@slhs.org

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