



May 17, 2019

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ATTN: Document Control Desk,
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RE: REPLY TO A NOTICE OF VIOLATION: NRC Inspection Report No. 030056112/2018001

Governor Juan Luis Hospital and Medical Center (JFL) provides below this reply to notice of violation pursuant to the provisions of 10 CFR 2.201. This reply will address the requirements of notice of violation dated April 17, 2019.

VIOLATION

10 CFR 35.67 (g) states in part that licensee in possession of sealed sources or brachytherapy sources, except for gamma stereotactic radiosurgery sources, shall conduct a semi-annual physical inventory of all such sources in its possession.

Contrary to the above, as of September 17, 2018, the licensee failed to conduct semi-annual physical inventories of all such sources in its possession. Specifically, the license did not perform semi-annual inventories of dose calibrator and instrument check sources in its possession, since the last inspection of September 14, 2016.

(1) The reason for the violation*

The Nuclear Medicine program at JFL is a 60%/40% partnership between Advanced Radiology (Marcel Galiber) and JFL that has existed since 2002.

Since the suspension of this Nuclear Medicine service line, as of August 2013, and the separation of the Advance Radiology Technologist, (Scott Brinkhoff, ARTR,N,CT) in 2017, we currently do not perform and have ceased nuclear studies. As discovered based on our investigation into this matter, the last inspection was conducted in September of 2016.

Compliance with this requirement, despite cessation of these services, was an oversight as was not clearly defined or communicated to JFL. **see email from Advanced Radiology (Marcel Galiber) dated 5/7/19.*

(2) The corrective steps that have been taken and the results achieved

On May 1, 2019, JFL's Pac Administrator (Luis Gonzales, CNMT) was provided biometric access the Nuclear Medicine Lab and conducted a physical inventory of the long live sources in our possession. We now have up-to-date documented history of the inventory completed, in an excel spreadsheet, with type of source, date originally measured, the assay dates, original activity, and serial number of the sources.

(3) The corrective steps that will be taken to avoid further violations

JFL has designated an authorized qualified employee (Luis Gonzales, CNMT) to conduct the semi-annual physical inventory of all sources in our possession. This task will be monitored by the Radiation Safety Officer (Dr. Angelo Galiber).

All required PM's and calibration will be performed upon relocation of the department and prior to restart of services.

Post Hurricanes of 2017, JFL is currently in the design/construction phase of moving all hospital services including Nuclear Medicine, into a temporary hardened structure by May of 2020.

(4) The date when full compliance will be achieved

Full compliance for semi-annual inventory was achieved May 1, 2019.

Full compliance for program oversight to include PM's and calibration projected for May 2020 which is subject to turn-key completion of new hardened structures.

END OF REPORT