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Philadelphia, Pennsylvania 19106

August 7, 1979

Boyce H. Grier, Director  
United States Nuclear Regulatory  
Commission  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Dear Sir:

In response to Docket No. 030-015125, the subject of which is Inspection 030-015125/79-01, we submit the following as a statement and/or explanation.

- A) We are presently drafting a procedure manual which will become part of the personnel booklet given to each employee. This manual will contain an explanation of terms as well as instructions and methods to minimize exposure. It shall also demonstrate the purpose and function of both protective and monitoring devices. Another integral part will be a general step by step procedure of what should (and should not) be done in "emergency" situations. This manual, in conjunction with the lecture and demonstrations to be presented, should provide all instructions necessary for an individual working in a restricted area.
- B) 1) Surveys of radioactive materials discharged in effluent air from fume hood shall be done routinely. We will purchase a  $^{133}\text{Xe}$  alarm room monitor for the purpose of evaluating  $\text{Xe-}^{133}$  discharge into unrestricted areas. The unit shall serve as a constant monitor for the laboratory area around the fume hood. Additionally, our intention is to make passive air samplings for Iodine- $^{131}$  over a charcoal filter which is to be analyzed against an

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131 I-Standard. This process shall be done periodically and shall be accomplished via a vacuum pump system.

2) We are now adhering to a routine system for laboratory survey to detect any contamination on the absorbent paper placed on all counter-tops. A daily check of the applicable areas of the lab is done using a survey meter as well as swipe testing. Upon changing the absorbent material, it shall always be checked for contamination of licensed material before being removed to the normal trash. Gloves will be disposed in radiation waste containers.

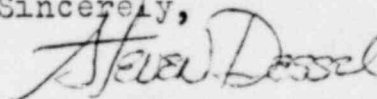
3) In the past, we have utilized our basement area as a secondary storage area for decaying materials. It was our practice to keep waste materials in the concrete decay bin for as long as possible to permit maximum decay time. After such time, the material is packaged and moved to the basement area for complete decay. Presently, our intention is to renovate this present basement storage area by constructing a raised platform on the floor. We also plan to enclose an 18 ft. x 33 ft. area with chain link fence to prevent unauthorized access. We further intend to denote this area as "restricted". To this extent we shall limit access to the entire basement and to the fenced area by having locks on the doors to each. We shall also add the area to that coming under routine survey evaluation. This construction shall begin during the week of August 13, 1979. A request for ammendment to our materials license is in process.

4) The following shall be implemented as soon as the instruments ordered are available. The person who elutes the generators shall check both hands and clothing before leaving the generator room. This will be accomplished using a monitor which will be located at the doorway. Another precaution to be instituted shall be a check of clothing and hands by each employee before leaving the dose-drawing area. This gross check shall be done with the existing ludum instrument. This is in addition to the wearing of the TLD badges for all employees, and finger badges for those who may be drawing doses, eluting generators, or preparing radiopharmaceutical kits. Finally, as a last check before leaving the laboratory, we plan to install a portal monitor in the threshold area between the offices and lab.

- C) 1) Syringe shields are presently being used for kit preparation. For the eluting of generators we rely on the vial shieldings as supplied by the manufacturer.
- 2) Smoking was and is not allowed anywhere within the laboratory area. True, during the June 18, 1979 inspection, one of the drivers did light a cigarette; but he was immediately told to extinguish it and reminded of the no smoking, eating, drinking rule as posted in the laboratory. This was done by one of our staff and even if inspection was not underway, the same action would have been taken.
- 3) With respect to laboratory coats, it was explained to Mr. O'Neill that, as a procedure, we all wear lab coats; however on this Monday morning, the Linen Service did not bring coats until later in the day. We have since added one more coat for each employee so as to have one in the laundry, one in reserve, and one in service.
- 4) No one involved in radiopharmaceutical preparation is ever without a film badge. On the inspection day one driver was without a film badge because we had not yet recieved it from Eberline. We have since obtained "blank" badges for immediate assignment to new employees.
- 5) As previously explained in B-3 above.
- D) A request for ammendment (Control No. 00618) submitted to U.S.N.R.C. for review explains our plan for waste pick-up from our specific hospital accounts only.

In closing, I should like to add that we shall be providing more written material for all employees concerning radiation protection and safety. We are also undergoing the process of an independent audit in the field of radiation management. Thus, we are continuing to improve both our facility and programs to decrease the possibility of further infractions, as well as, considering a disciplinary code for all employees.

Sincerely,



Steven Dessel, RPh  
Pharmacy Manager

cc: R. Sanchez  
N. DeSantis  
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Central File

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