

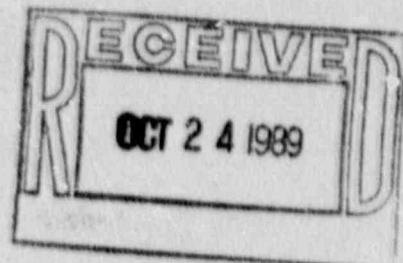


Holy Rosary Hospital

(406) 232-2540 1-800-843-3820
2101 Clark Street, Miles City, Montana 59301

October 13, 1989

United States Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011



RE: License No. 25-23109-01
Docket : 30-20264/89-01

Gentlemen:

This letter is in response to an inspection made at Holy Rosary Hospital on August 9, 1989, and a letter based on that inspection dated September 27, 1989.

In response to the number of misadministrations being out of proportion to the number of studies performed at Holy Rosary Hospital, it is the conclusion of Holy Rosary Hospital Administration that this problem has been solved with the departure of the former Chief Technologist. The Chief Technologist was solely responsible for Nuclear Medicine and all its administrative requirements.

We feel that the new Chief Technologist brings with her a fresh, invigorating attitude that assures a positive relationship among all the essential personnel in Nuclear Medicine. The new Technologist brings with her a thorough approach to the drawing of radioactive material and the administration of that material to the patients. Additionally, the Nuclear Medicine Technologist is supervised by the Chief Technologist so there is an administrative structure to detect deficiencies before they occur.

Holy Rosary Hospital offers the following response to the violations noted in the investigator's report of August 9, 1989.

8911010180 891018
REG4 LIC30
25-23109-01 PDC

MEMBERS OF PRESENTATION HEALTH SYSTEM

FACE Shared Services
Sioux Falls, South Dakota

McKenna Hospital
Sioux Falls, South Dakota

Brady Memorial and Wilge Home
Mitchell, South Dakota

St. Joseph Hospital
Mitchell, South Dakota

Marshall County Memorial Hospital
Britton, South Dakota

Faulk County Memorial Hospital
Faulkton, South Dakota

Dickey County Memorial Hospital
Ellendale, North Dakota

A.L. Vadheim Memorial Hospital
Tyler, Minnesota

Garfield County Health Center
Jordan, Montana

St. Joseph Hospital
Polson, Montana

Mother Joseph Manor
Aberdeen, South Dakota

St. Luke's Midland
Aberdeen, South Dakota

Prince of Peace
Sioux Falls, South Dakota

IEO7

IC-89-611

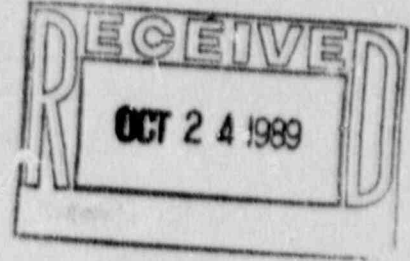


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8911010180 891018
REG4 LICRO
25-23109-01 FDC

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IFO7

IC-89-1661

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Item 1E: Failure to perform accuracy tests:

In response to this violation, our Consulting Physicist, Rod Wimmer, responds:

"I have visited Holy Rosary Hospital on March 20, 1986, September 12, 1986, November 7, 1986, March 20, 1987, April 27, 1987, May 27, 1988, August 26, 1988, March 3, 1989, and June 20, 1989. Except for the visit on June 20, 1989, I personally performed the accuracy tests on the dose calibrator and reviewed all the records required by the Nuclear Regulatory Commission for operation of the Nuclear Medicine facility. All records were present until March 3, 1989, and all the accuracy tests were current through that date. Additionally, the records for the survey meter calibration were in the notebook used to store such documents.

The disappearance of the critical records clearly demonstrating the performance of the accuracy tests is unexplainable at this time. I would like to personally attest to the performance of these tests and the existence of these records.

It was always the first order of business on my visit to Holy Rosary Hospital to review the records so that previous violations would not be repeated.

Geometric dependence of the dose calibrator: Prior to the former Chief Technologist's departure, I had a conversation with him explaining the procedure for measuring geometric dependency of the dose calibrator for the "loaner" dose calibrator. The Chief Technologist sent me this data and I reviewed it noting that it met Nuclear Regulatory Commission requirements. I advised the Chief Technologist that he should perform this test on the repaired calibrator when it was returned and he assured me he would.

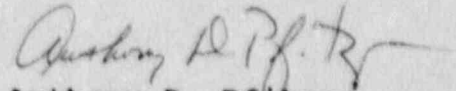
The dose calibrator was returned on March 22, 1989, and a few days later the Chief Technologist was suspended for a week, returned for two weeks and terminated his employment with Holy Rosary Hospital. During his suspension and following his termination, a new staff person assumed his duties. The suspended Technologist did not report the results of the geometry test or advise the new Technologist that it needed to be done. It is felt during this interval that the administrative control of the nuclear medicine facility was inadequate."

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The administrative structure that was in place during this episode has been changed hospital-wide. The hospital has a new Administrator, the department has a new Chief Technologist, and a new Nuclear Medicine Technologist. We feel that with these changes better communication exists among the principal parties and the necessary supervision is in place to assure that the events of the past are not repeated.

If there are any additional questions, please do not hesitate to contact me.

Sincerely,



Anthony D. Pfitzer
Executive Director

ADP/pat

cc: Dr. R. E. Sievers
Ms. Kristi Stein
Mr. Paul Bergman