OCT 26 1989

In Reply Refer To:
License: 17-01322-07
Docket: 30-15040/89-02

Veterans Administration Medical Center
ATTN: John Church
Hospital Director
1601 Perdido Street
New Orleans, Louisiana 70146

Gentlemen:

This refers to your letter dated September 13, 1989, in response to our letter and attached Notice of Violation dated August 29, 1989. We have reviewed your reply and find that additional information is needed.

Subsequent to our review of your response, Ms. Linda Kasner of our office contacted Mr. Carl Gaspard of your staff by telephone on October 12, 1989. During this conversation Mr. Gaspard explained that those records enclosed with your letter, which had been missing during the inspection conducted on August 9 and 10, 1989, had been supplied to you by a consulting medical physicist who maintains duplicate copies of documents provided with his services. Although you have been able to subsequently obtain copies of these records, it should be understood that those violations related to record retention requirements will remain as stated in the Notice of Violation. We wish to emphasize the importance of good test and procedure documentation, as well as the availability of these documents to your staff. You should also note that the review of these documents should not be focused solely on the test result, but should also include an evaluation of the procedure used to obtain the result.

During our review of your response, we noted that you have not fully responded to those items specified on page 2 of the Notice of Violation. Specifically, your reply does not indicate that you have identified the root cause of the violations or that you have initiated policies or procedures that will ensure that your corrective actions remain effective and that these violations do not recur. Consequently you are required to respond with the following for each of the five violations:

- The reason for the violation
- The corrective steps which have been taken to prevent further violations

RIV:NMIS LLK
LLKasner:ch
10/24/89

C:NMIS CLC
CLCain
10/24/89

D:DRSS ABB
ABBeach
10/25/89

IE-07

8911030036 891026
REG4 LIC30
17-01322-07 PDC

You should provide your response to this office within 10 days of the receipt of this letter. Should you have any questions concerning this matter please call Linda Kasner at (817) 860-8100.

Sincerely,

Blaine Murray for

A. Bill Beach, Director
Division of Radiation Safety
and Safeguards

cc:
Louisiana Radiation Control Program Director

bcc w/copy of licensee letter:
DMB - Original (IE-07)
RDMartin
ABBeach
LAYandell
LShea, RM/ALF (AR-2015)
CLCain
RJEverett
LLKasner
NMSB
MIS System
RIV Files (2)
RSTS Operator

1 - Medical Center

1601 Perdido Street
New Orleans LA 70146

Veterans Administration

SEP 1 3 1989

In Reply Refer To: 629/115

SEP 2 5 1989

Mr. William L. Fisher, Chief
Nuclear Materials Safety
United States Nuclear Regulatory Commission
Region IV
Suite 1000
Arlington, Texas 76011

THRU: Director, Nuclear Medicine Service (115)
c/o Ms. Helen Malaskiewicz
Program Analyst
Department of Veterans Affairs
810 Vermont Avenue, N.W.
Washington, D.C. 20420

Dear Mr. Fisher:

The following is in reply to the violations sited in your 29 August 1989 letter regarding NRC License #17-01322-07, Docket 30-15040/89/02:

1. The Picker Micro-Cal dose calibrator, Serial No. 238201, test for linearity has been achieved, but not in an activity range as low as 10 microcuries. Effective immediately the dose calibrator will be tested for linearity quarterly and activities employed for the determination will be from the highest dosage administered to 10 microcuries or less.

2. Enclosed please find records of linearity and accuracy performed on the Picker Micro-Cal dose calibrator, Serial No. 238201, for the fourth quarter of 1988.

3. Enclosed please find 5 April 1989 record of wipe/leak test for the 137 Cesium sealed sources. The wipe/leak test on the two 137 Cesium sealed sources were performed 29 February 1988; results enclosed. Note that due to technical error these are invalid as the sources were counted on the 57 Cobalt window. The Radiation Safety Officer will insure that wipe/leak test are performed in a timely manner and that correct spectrometer settings are employed. The review process will be documented on the wipe/leak test result form by employing a signature space for the Radiation Safety Officer.

4. Records of sealed source inventory have been maintained by documentation of wipe/leak test results. We have changed this procedure and a physical inventory will be performed quarterly to document possession of sealed sources at this station. Enclosed please find "sample" of sealed source inventory form.

~~8910030224~~ 1 2pp

IC-89-629

IE07

5. Radiation survey performed of the laboratory indicating removable contamination will be recorded in disintergrations per minute per 100 square centimeters. A conversion factor will be employed to convert counts per minute per 100 square centimeters to disintergrations per minute as required. Enclosed please find "sample" calculation of conversion factor employed.

With implementation of all items above, we feel that we are in full compliance.

Sincerely,

JOHN D. CHURCH, JR.
Medical Center Director

Enclosures: 5

[redacted]

9/20/89

JAMES W. FLETCHER, M.D.
Director, Nuclear Medicine Service (115)
Veterans Administration
Washington, DC 20420

GEORGE R. MECKSTROTH, Ph.D.
Certified Radiological Physicist
American Board of Radiology

1430 Tulane Avenue
New Orleans, Louisiana 70112
(504) 588-5486

CERTIFICATE OF DOSE CALIBRATION ACCURACY OF RESPONSE

Location: VA Medical Center
1601 Perdido Street
New Orleans, Louisiana 70146

Date: 7 October 1988

DOSE CALIBRATOR: Picker Micro Cal
Serial: 238201

Reference Standard	Activity	Dose Calibrator Assay	% Error
^{57}Co	1.38 mCi	1.42 mCi	2.9%
^{133}Ba	186.0 µCi	183 µCi	1.6%
^{137}Cs	270.85µCi	273 µCi	0.8%

Reference Standard Identification:

^{57}Co, Amersham Model CTCV1, Code.568, Serial 7047MA, 5 mCi on 1 March 1987
^{133}Ba, NES-358, Serial 3580383A-18, 263 µCi on 3-29-83
^{137}Cs, Amersham Model CDC.V1, Code CDR.562, Serial 3893MA, 250 µCi on 1 June 1987

George R. Meckstroth, Ph.D.
Certified Radiological Physicist

GEORGE R. MECKSTROTH, Ph.D.
Certified Radiological Physicist
American Board of Radiology

1430 Tulane Avenue
New Orleans, Louisiana 70112
(504) 588-5686

DOSE CALIBRATION/REPRODUCIBILITY

Location: VA Medical Center
1601 Perdido Street
New Orleans, Louisiana 70146

Date: 7 October 1988

Reference Standard:

^{137}Cs, Amersham Model CDC.V1, Code CDR.562,
Serial 3893MA, 250 µCi on 1 June 1987
Decay Factor, 3 months = 0.99424

Dose Calibrator: Picker Micro Cal; Serial 23801

Nuclide	Setting	^{137}Cs Assay µCi 10/07/88
^{99m}Tc	1	578
^{131}I	2	357
^{67}Ga	3	499
^{133}Xe	4	376
^{201}Tl	5	326
^{123}I	6	248
^{111}In	7	259

George R. Meckstroth, Ph. D.

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Certified Radiological Physicist
American Board of Radiology

1430 Tulane Avenue
New Orleans, Louisiana 70112
(504) 588-5686

DOSE CALIBRATOR INSPECTION

Location: VA Medical Center
1601 Perdido Street
New Orleans, Louisiana 70146

Date: 7 October 1988

Dose Calibrator: Picker Micro Cal; Serial 238201

Chamber Liner

In Place: ✓

Not In Place: _____

Adjustment Made:

Instrument Zero

Properly Set: ✓

Not Properly Set: _____

Adjustment Made:

George R. Meckstroth, Ph. D.

Date: 10/24/88))) DOSE CALIBRATOR LINEARITY TEST REPORT (((

VA MEDICAL CENTER - LA1025
1601 PERDIDO STREET
Date Of Test - 10/18/88 @ 7:30 Method: Decay Method

))) INSTRUMENT TESTED (((

Instrument Name - Dose Calibrator
Manufacturer - PICKER
Last Linearity Date - 07/19/88
Next Linearity Due - 01/17/89

Model Number - M.CAL
Serial Number - 6630-3555
Instrument ID - "A "

))) LINEARITY MEARUEMENT DATA (((

Delay	Predicted Measurement Date/Time	Actual Measurement Time (24h)	NET MEASURED ACTIVITY (mCi.) #1	#2	#3	Average	Predicted Activity	Error %
0 Hours	10/18/88 @ 7:30	7:30	212.0	211.0	211.0	211.3 mCi	207.9 mCi	-1.63 %
6 Hours	10/18/88 @ 13:30	13:45	96.4	96.3	96.3	96.3 mCi	101.3 mCi	4.86 %
24 Hours	10/19/88 @ 7:30	7:30	13.20	13.20	13.20	13.20 mCi	13.12 mCi	-0.64 %
30 Hours	10/19/88 @ 13:30	13:30	6.63	6.55	6.54	6.57 mCi	6.57 mCi	0.00 %
48 Hours	10/20/88 @ 7:30	7:40	0.824	0.818	0.821	0.821 mCi	0.812 mCi	-1.15 %

))) Comments and Recommendations (((

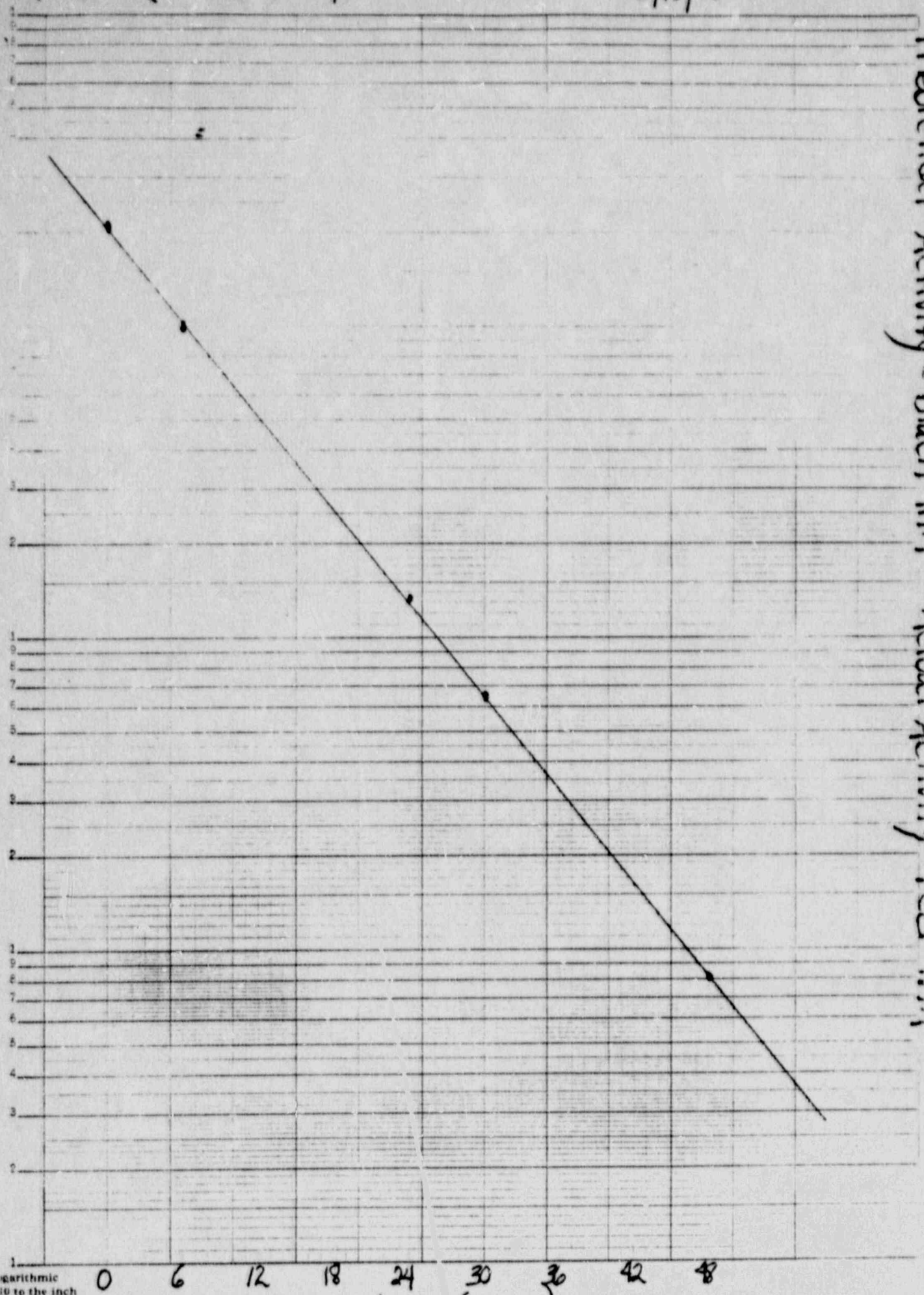
Instrument Performance Is Within The Acceptable Limits Of 5% Error. No Corrective Action Is Necessary.

Linearity Tests On All Dose Calibrators Need To Be Performed At Least Quarterly In Accordance With Federal And State Regulations. This Instrument Is Due For Its Next Test By Tuesday January 17, 1989

Performed by: Carl L Morgan Title: Supervisory Health Physicist/RSO

Radiation Safety Officer: Carl L Morgan (Signiature Required: 10CFR35)

PICKER M.CAL S/N 6650-3555 10/18/88



137-CS SEALED SOURCE WIPE TEST

VETERANS ADMINISTRATION MEDICAL CENTER
1601 PERDIDO STREET
NEW ORLEANS, LOUISIANA 70146

WIPE/LEAK TEST DATA

Location: V.A. Medical Center New Orleans
1601 Perdido Street
New Orleans, Louisiana 70146

Date: 5 April 1989

Source Identification:
Reference Standards

Equipment Used:

Packard 500C Auto Gamma Counter System, H.V. =3319; LL = 620, UL = 720, 137Cs Conversion Factor = 7.2x10-6 uCi/cpm.

Sample #	Location	Gross cpm	Bkg cpm	Net cpm	Activity in uCi
1.	137 Cs, Tech/Ops, Amersham Calibration Device, Model 77302, Serial S596, 0.1488 Ci on 4-27-87	10	10	0	0
2.	137 Cs, Tech/Ops, Amersham Calibration Device, Model 77302 Serial S595, 0.165 Ci on 7-21-87	11	10	1	7.2x10-6

Carl L. Gaspard

Carl L. Gaspard
Radiation Safety Officer

ASSAY # 1537 BKG/C057 00/00/00

ID CODE : BKG/C057
PROTOCOL # : 16
OF TUBES : 2
DATE : 02/29/88
MODE : A
CHANNEL : 1
ISOTOPE : C
TUBE SIZE : L
COUNTING TIME : 10
BACKGROUND A : 43
BACKGROUND B : 53

Wipe test for
Tech/Ops Model 773
Instrument
Calibration Device

COUNT DATA FOR ASSAY # 1537 BKG/C057

TUBE	COUNT	
1	21	:
2	20	:

02/29/88

reading = ≅ 1×10^{-5} μCi

[signature] Ph.D.
consultant [illegible]

Page No. 09/07/89

Sealed Source Inventory Worksheet

Sealed Source Inventory

Vendor	Isotope	Source Physical Form	Serial #	Current Activity on Date/ Activ. @Calibration Date	Requires Leaktest?	Last Leak Test-Date	Inventory Physically Verified By Name P
** Location :A1225 - VA MEDICAL CENTER :601 PERDIDO STREET							
NEW-RULER	Co-57	Rod Source	R631085A-11	3.8236 uCi on 09/07/89 150.0000 uCi on 10/21/85	No	11/21/87	SEM
NEN	Ba-133	Vial Reference Source	35803834-58	178.8795 uCi on 09/07/89 259.0000 uCi on 03/29/83	Yes	08/09/89	CFM
AMERSHAM	Co-57	Vial Reference Source	7797MA	1.6359 uCi on 09/07/89 5.7860 uCi on 05/01/88	Yes	08/09/89	CFM
NEN	Co-57	Disk Source	NES-289	4.8751 uCi on 09/07/89 50.0000 uCi on 01/01/87	No	N/A	CFM
NEN	Co-57	Disk Source	9-289405 (A)	4.7438 uCi on 09/07/89 50.0000 uCi on 03/01/87	No	N/A	CFM
NEN	Co-57	Disk Source	9-289005 (B)	4.7438 uCi on 09/07/89 50.0000 uCi on 03/01/87	No	N/A	CFM
AMERSHAM	Cs-137	Dosimeter Calibrator	5595	157.1113 mCi on 09/07/89 168.0040 mCi on 07/21/87	Yes	04/05/89	CFM
AMERSHAM	Cs-137	Dosimeter Calibrator	5596	141.6858 mCi on 09/07/89 148.8070 mCi on 07/21/87	Yes	04/05/89	CFM

Performed by: Carl Morgan Title: RSO

Radiation Safety Officer: Carl Morgan (Signature Required: 10CFR35)

ROCHE PROFESSIONAL SERVICE CENTER INC.
525 JEFFERSON HIGHWAY, SUITE 806
JEFFERSON, LOUISIANA 70121
(504) 837-2311

September 8, 1989

Carl Gaspard
VA Medical Center
Nuclear Medicine Department
1601 Perdido Street
New Orleans, Louisiana 70146

Dear Carl:

As per your request, all further wipe tests will be reported to you in disintegrations per minute (DPM). Please find attached the efficiency form for the Ludlum 1000 we use to count your swipes. The formula we will use to convert counts per minute to disintegrations per minute is as follows:

$$DPM = \frac{CPM}{efficiency}$$

(the efficiency of the Ludlum model 1000 is 0.00934)

If you have any questions or need any further information, please do not hesitate to give me a call.

Sincerely,

ROCHE PROFESSIONAL SERVICE CENTER INC.

Anthony J. Edmond, R.Ph.
Eastern Regional Operations Manager

Enclosure

AJE/cs

SCALER EFFICIENCY

Instrument tested: Ludlum Model 1000

S/N: 33651

Geometry of Instrument: Top of Well Counter

Source used: Cs 137 Rod Source

S/N: NES-1395-C42386

Activity: 0.0965 uCi

DATA:

One Minute Counts:	1.	2117
	2.	2090
	3.	2154
		2120
Average:		
- background:		128
= Net CPM		1992

ACTION LEVEL FOR WIPE TESTING IS 10 NANOCURIES

OR 2.2×10^4 DPM (22,000 DPM)

Efficiency Equation:

$$\frac{\text{Net CPM of standard source}}{\text{Source Activity} \times 2.2 \times 10^6 \text{ dpm/uCi}} = \text{Efficiency}$$

$$\frac{1992 \text{ CPM}}{(0.0965 \text{ uCi}) \times 2.2 \times 10^6 \text{ dpm/uCi}} = .00938$$

EFFICIENCY OF COUNTING INSTRUMENT IS .00938

DETERMINATION OF ACTION LEVEL (10 NANOCURIES) IN CPM:

Equation:

Efficiency X 22000 DPM = Action Level in CPM

.00938 X 22000 DPM = 206 CPM

Therefore, any internal wipe test reading exceeding 206 CPM will be considered more than is recommended by regululatory agencies, and some action should be taken to correct contamination. Decontamination procedures are outlined in the policies and procedures manual.

Signature: Jeff Juneau date: 5/18/89

VETERANS AFFAIRS
MEDICAL CENTER
1601 Perdido St.
New Orleans, LA 70146

SEP 1 3 1989

629/115

Mr. William L. Fisher, Chief
Nuclear Materials Safety
United States Nuclear Regulatory Commission
Region IV
Suite 1000
Arlington, Texas 76011

THRU: Director, Nuclear Medicine Service (115)
c/o Ms. Helen Malashkevics
Program Analyst
Department of Veterans Affairs
810 Vermont Avenue, N.W.
Washington, D.C. 20420

Dear Mr. Fisher:

The following is in reply to the violations sited in your 29 August 1989 letter regarding NRC License #17-01322-07, Docket 30-15040/89/02:

1. The Picker Micro-Cal dose calibrater, Serial No. 238201, test for linearity has been achieved, but not in an activity range as low as 10 microcuries. Effective immediately the dose calibrator will be tested for linearity quarterly and activities employed for the determination will be from the highest dosage administered to 10 microcuries or less.

2. Enclosed please find records of linearity and accuracy performed on the Picker Micro-Cal dose calibrater, Serial No. 238201, for the fourth quarter of 1988.

3. Enclosed please find 5 April 1989 record of wipe/leak test for the 137 Cesium sealed sources. The wipe/leak test on the two 137 Cesium sealed sources were performed 29 February 1988; results enclosed. Note that due to technical error these are invalid as the sources were counted on the 57 Cobalt window. The Radiation Safety Officer will insure that wipe/leak test are performed in a timely manner and that correct spectrometer settings are employed. The review process will be documented on the wipe/leak test result form by employing a signature space for the Radiation Safety Officer.

4. Records of sealed source inventory have been maintained by documentation of wipe/leak test results. We have changed this procedure and a physical inventory will be performed quarterly to document possession of sealed sources at this station. Enclosed please find "sample" of sealed source inventory form.

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2.

Mr. William Fisher

5. Radiation survey performed of the laboratory indicating removable contamination will be recorded in disintergrations per minute per 100 square centimeters. A conversion factor will be employed to convert counts per minute per 100 square centimeters to disintergrations per minute as required. Enclosed please find "sample" calculation of conversion factor employed.

With implementation of all items above, we feel that we are in full compliance.

Sincerely,

JOHN D. CHURCH, JR.
Medical Center Director

Enclosures: 5

9/20/84

JAMES W. FLETCHER, M.D.
Director, Nuclear Medicine Service (115)
Veterans Administration
Washington, DC 20420

GEORGE R. MECKSTROTH, Ph.D.
Certified Radiological Physicist
American Board of Radiology

1430 Tulane Avenue
New Orleans, Louisiana 70112
(504) 588-5486

CERTIFICATE OF DOSE CALIBRATION ACCURACY OF RESPONSE

Location: VA Medical Center
1601 Perdido Street
New Orleans, Louisiana 70146

Date: 7 October 1988

DOSE CALIBRATOR: Picker Micro Cal
Serial: 238201

Reference Standard	Activity	Dose Calibrator Assay	% Error
^{57}Co	1.38 mCi	1.42 mCi	2.9%
^{133}Ba	166.0 µCi	163 µCi	1.6%
^{137}Cs	270.85µCi	273 µCi	0.8%

Reference Standard Identification:

^{57}Co, Amersham Model CTCV1, Code.568, Serial 7047MA, 5 mCi on 1 March 1987
^{133}Ba, NES-358, Serial 3580383A-18, 263 µCi on 8-29-83
^{137}Cs, Amersham Model CDC.V1, Code CDR.562, Serial 3893MA, 250 µCi on 1 June 1987

George R. Meckstroth, Ph.D.
Certified Radiological Physicist

GEORGE R. MECKSTROTH, Ph.D.
Certified Radiological Physicist
American Board of Radiology

1430 Tulane Avenue
New Orleans, Louisiana 70112
(504) 588-5686

DOSE CALIBRATION/REPRODUCIBILITY

Location: VA Medical Center
1601 Perdido Street
New Orleans, Louisiana 70146

Date: 7 October 1988

Reference Standard:

^{137}Cs, Amersham Model CDC.V1, Code CDR.562,
Serial 3893MA, 250 µCi on 1 June 1987
Decay Factor, 3 months = 0.99424

Dose Calibrator: Picker Micro Cal; Serial 23801

Nuclide	Setting	^{137}Cs Assay µCi 10/07/88
^{99m}Tc	1	578
^{131}I	2	357
^{67}Ga	3	499
^{133}Xe	4	376
^{201}Tl	5	326
^{123}I	6	248
^{111}In	7	259

George R. Meckstroth, Ph. D.

GEORGE R. MECKSTROTH, Ph.D.
Certified Radiological Physicist
American Board of Radiology

1430 Tulane Avenue
New Orleans, Louisiana 70112
(504) 588-5486

DOSE CALIBRATOR INSPECTION

Location: VA Medical Center
1601 Perdido Street
New Orleans, Louisiana 70146

Date: 7 October 1988

Dose Calibrator: Picker Micro Cal; Serial 238201

Chamber Liner

In Place: ✓

Not In Place: _____

Adjustment Made:

Instrument Zero

Properly Set: ✓

Not Properly Set: _____

Adjustment Made:

George R. Meckstroth, Ph. D.

Date: 10/24/88))) DOSE CALIBRATOR LINEARITY TEST REPORT (((

VA MEDICAL CENTER - LA1025
1601 PERDIDO STREET
Date Of Test - 10/18/88 @ 7:30 Method: Decay Method

))) INSTRUMENT TESTED (((

Instrument Name - Dose Calibrator
Manufacturer - PICKER
Last Linearity Date - 07/19/88
Next Linearity Due - 01/17/89

Model Number - M.CAL
Serial Number - 6630-3555
Instrument ID - "A "

))) LINEARITY MEARUEMENT DATA (((

Delay	Predicted Measurement Date/Time	Actual Measurement Time (24h)	NET MEASURED ACTIVITY (mCi.) #1	#2	#3	Average	Predicted Activity	Error %
0 Hours	10/18/88 @ 7:30	7:30	212.0	211.0	211.0	211.3 mCi	207.9 mCi	-1.63 %
6 Hours	10/18/88 @ 13:30	13:45	96.4	96.3	96.3	96.3 mCi	101.3 mCi	4.86 %
24 Hours	10/19/88 @ 7:30	7:30	13.20	13.20	13.20	13.20 mCi	13.12 mCi	-0.64 %
30 Hours	10/19/88 @ 13:30	13:30	6.63	6.55	6.54	6.57 mCi	6.57 mCi	0.00 %
48 Hours	10/20/88 @ 7:30	7:40	0.824	0.818	0.821	0.821 mCi	0.812 mCi	-1.15 %

))) Comments and Recommendations (((

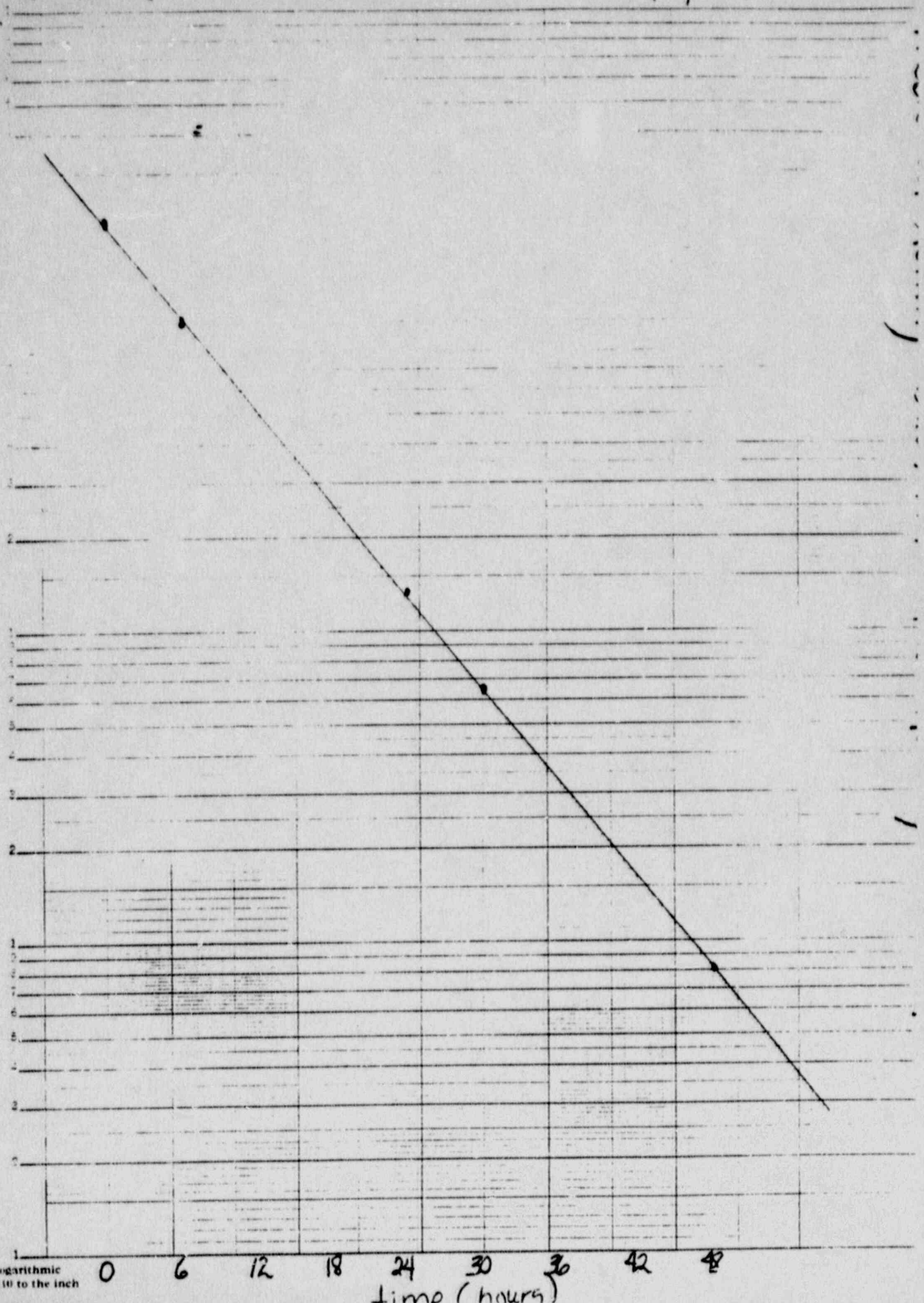
Instrument Performance Is Within The Acceptable Limits Of 5% Error. No Corrective Action Is Necessary.

Linearity Tests On All Dose Calibrators Need To Be Performed At Least Quarterly In Accordance With Federal And State Regulations. This Instrument Is Due For Its Next Test By Tuesday January 17, 1989

Performed by: Carl L Mazzanti Title: Supervisory Health Physicist/RSO

Radiation Safety Officer: Carl L Mazzanti (Signature Required: 10CFR35)

PICKER M.CAL S/N 6630-3555 10/18/88



137-CS SEALED SOURCE WIPE TEST

VETERANS ADMINISTRATION MEDICAL CENTER
1601 PERDIDO STREET
NEW ORLEANS, LOUISIANA 70146

WIPE/LEAK TEST DATA

Location: V.A. Medical Center New Orleans
1601 Perdido Street
New Orleans, Louisiana 70146

Date: 5 April 1989

Source Identification:
Reference Standards

Equipment Used:

Packard 500C Auto Gamma Counter System, H.V. =3319; LL = 620, UL = 720, 137Cs Conversion Factor = 7.2x10-6 uCi/cpm.

Sample #	Location	Gross cpm	Bkg cpm	Net cpm	Activity in uCi
1.	137 Cs, Tech/Ops, Amersham Calibration Device, Model 77302, Serial S596, 0.1488 Ci on 4-27-87	10	10	0	0
2.	137 Cs, Tech/Ops, Amersham Calibration Device, Model 77302 Serial S595, 0.165 Ci on 7-21-87	11	10	1	7.2x10-6

Carl L. Gaspard
Radiation Safety Officer

NUCLEAR MEDICINE SERVICE

ROOM 2E119, DECAY STORAGE ROOM

ASSAY # 1537 BKG/C057 00/00/00

ID CODE : BKG/C057
PROTOCOL # : 16
OF TUBES : 2
DATE : 02/29/88
MODE : A
CHANNEL : 1
ISOTOPE : C
TUBE SIZE : L
COUNTING TIME : 10
BACKGROUND A : 43
BACKGROUND B : 53

Wipe test for
Tech/Ops Model 773
Instrument
calibration Device

02/29/88

COUNT DATA FOR ASSAY # 1537 BKG/C057

TUBE	COUNT
1	21
2	20

reading = $\geq 1 \times 10^{-5}$ μCi

R McG PhD
consultant Health

Sealed Source Inventory Worksheet

Sealed Source Inventory

Vendor	Isotope	Source Physical Form	Serial #	Current Activity on Date/ Activity & Calibration Date	Requires Leaktest?	Last Leak Test-Date	Inventory Physical Verified On Hand
** Location LA:035 - VA MEDICAL CENTER :601 PERDIDO STREET							
NEN-RADIER	Cs-137	Rod Source	283:085A-11	3.8236 uCi on 09/07/89 150.0000 uCi on 10/21/85	No	11/21/87	CEM
NEN	Ba-133	Vial Reference Source	3580383A-58	178.8795 uCi on 09/07/89 259.0000 uCi on 03/29/83	Yes	08/09/89	CEM
AMERSHAM	Co-57	Vial Reference Source	7797MA	1.6359 uCi on 09/07/89 5.7860 uCi on 05/01/88	Yes	08/09/89	CEM
NEN	Co-57	Disk Source	NES-289	4.8795 uCi on 09/07/89 50.0000 uCi on 01/01/87	No	N/A	CEM
NEN	Co-57	Disk Source	S-289005 (A)	4.7438 uCi on 09/07/89 50.0000 uCi on 03/01/87	No	N/A	CEM
NEN	Co-57	Disk Source	S-289005 (B)	4.7438 uCi on 09/07/89 50.0000 uCi on 03/01/87	No	N/A	CEM
AMERSHAM	Cs-137	Dosimeter Calibrator	5595	157.1113 mCi on 09/07/89 165.0000 mCi on 07/21/87	Yes	04/05/89	CEM
AMERSHAM	Cs-137	Dosimeter Calibrator	5596	141.6858 mCi on 09/07/89 148.8000 mCi on 07/21/87	Yes	04/05/89	CEM

Performed by: Carl Norgaard Title: RSO

Radiation Safety Officer: Carl Norgaard (Signature Required: 10CFR35)

ROCHE PROFESSIONAL SERVICE CENTER INC.
525 JEFFERSON HIGHWAY, SUITE 806
JEFFERSON, LOUISIANA 70121
(504) 837-2311

September 8, 1989

Carl Gaspard
VA Medical Center
Nuclear Medicine Department
1601 Perdido Street
New Orleans, Louisiana 70146

Dear Carl:

As per your request, all further wipe tests will be reported to you in disintegrations per minute (DPM). Please find attached the efficiency form for the Ludlum 1000 we use to count your swipes. The formula we will use to convert counts per minute to disintegrations per minute is as follows:

$$DPM = \frac{CPM}{\text{efficiency}}$$

(the efficiency of the Ludlum model 1000 is 0.00934)

please do not hesitate to give me a call.

Sincerely,

ROCHE PROFESSIONAL SERVICE CENTER INC.

Anthony J. Edmond, R.Ph.
Eastern Regional Operations Manager

Enclosure

AJE/cs

SCALER EFFICIENCY

Instrument tested: Ludlum Model 1000

S/N: 33651

Geometry of Instrument: Top of Well Counter

Source used: Cs 137 Rod Source

S/N: IES-1395-042386

Activity: 0.0965 uCi

DATA:

One Minute Counts:	1.	2117
	2.	2090
	3.	2154
		2120
Average: - background:		128
= Net CPM		1992

ACTION LEVEL FOR WIPE TESTING IS 10 NANOCURIES

OR 2.2×10^4 DPM (22,000 DPM)

Efficiency Equation:

$$\frac{\text{Net CPM of standard source}}{\text{Source Activity} \times 2.2 \times 10^6 \text{ dpm/uCi}} = \text{Efficiency}$$

$$\frac{1992 \text{ CPM}}{(0.0965 \text{ uCi}) \times 2.2 \times 10^6 \text{ dpm/uCi}} = .00938$$

EFFICIENCY OF COUNTING INSTRUMENT IS .00938

DETERMINATION OF ACTION LEVEL (10 NANOCURIES) IN CPM:

Equation:

Efficiency X 22000 DPM = Action Level in CPM

.00938 X 22000 DPM = 206 CPM

Therefore, any internal wipe test reading exceeding 206 CPM will be considered more than is recommended by regululatory agencies, and some action should be taken to correct contamination. Decontamination procedures are outlined in the policies and procedures manual.

Signature: Jeff Inman date: 5/18/89

AUG 29 1989

In Reply Refer To:
Docket: 30-15040/89-02
License: 17-01322-07

Veterans Administration Medical Center
ATTN: John Church
Hospital Director
1601 Perdido Street
New Orleans, Louisiana 70146

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Ms. L. L. Kasner of this office on August 9 and 10, 1989, of the activities authorized by NRC Byproduct Material License 17-01322-07 and to the discussion of our findings held by the inspector with members of your staff at the conclusion of the inspection.

The inspection was an examination of the activities conducted under the license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of the license. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, and observations by the inspector.

During this inspection, the inspector also reviewed the organization of both the nuclear medicine and research departments and the effectiveness of the Radiation Safety Committee and the Radiation Safety Officer in managing the various aspects of your radiation safety program. The inspector observed that these individuals appeared to function well in their respective roles and generally performed program audits that adequately identified and corrected potential safety problems.

The inspector also reviewed byproduct material receipt, utilization, and disposal activities and observed that these activities were conducted as authorized by your NRC Materials License. The inspector observed that the facilities designated for use by the nuclear medicine department, research labs, and storage area for byproduct material waste met the requirements of the Commission's regulations and the conditions of the license.

During this inspection, the inspector reviewed, with members of your staff, your proposed corrective actions related to the violations identified during the previous inspection conducted on May 11, 1989. Pursuant to our review of your letter dated July 13, 1989, it is our understanding that you will continue to suspend the use of xenon-133 until construction of the proposed exhaust system is completed. Additionally, we understand that you will verify the completion of your proposed corrective actions prior to using xenon-133 in the nuclear medicine department. As discussed with your staff, your proposed

*RIV:NMIS	C:NMIS	C:NMSB
LLKasner;lw	CLCain	WLFisher
8/28/89	8/28/89	8/28/89

*Previously Concurred

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changes may require license amendment and should be submitted for NRC review prior to implementation.

As reviewed with you at the conclusion of the inspection, certain of your activities were found not to be conducted in full compliance with NRC requirements. Consequently, you are required to respond to this matter, in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation enclosed with this letter.

The response directed by this letter and accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:
William L. Fisher

William L. Fisher, Chief
Nuclear Materials Safety Branch

Enclosure:
Appendix - Notice of Violation

cc w/enclosure:
Louisiana Radiation Control Program Director

bcc:
DMB - Original (IE-07)
RDMartin
ABBeach
REHall
WLFisher
LShea, RM/ALF (AR-2015)
*CLCain
*RJEverett
*Inspector
*NMSB
*MIS System
*RIV Files (2)
*RSTS Operator

*W/766

APPENDIX

NOTICE OF VIOLATION

Veterans Administration Medical Center
New Orleans, Louisiana

Docket: 30-15040/89-02
License: 17-01322-07

During an NRC inspection conducted on August 9 and 10, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the violations are listed below:

1. 10 CFR 35.50(b)(3) requires that each dose calibrator be tested for linearity upon installation and at least quarterly thereafter over the range of its use between the highest dosage that will be administered to a patient and 10 microcuries.

   Contrary to the above, during the period between January 1988 and August 1989, a Picker Micro-Cal dose calibrator, Serial No. 238201, had not been tested for linearity at activity ranges as low as 10 microcuries.

   This is a Severity Level IV violation. (Supplement VI)

2. 10 CFR 35.50(e) requires that a record shall be maintained for 2 years for each test performed under Section 35.50(b)(2) and (b)(3).

   Contrary to the above, during the inspection conducted on August 9 and 10, 1989, records of the linearity test performed during the fourth quarter of 1988 and an accuracy test performed in 1988 on a Picker Micro-Cal dose calibrator, Serial No. 238201, were not available.

   This is Severity Level V violation. (Supplement VI)

3. 10 CFR 35.59(d) requires that records of leak tests of sealed sources shall be retained for a period of 5 years.

   Contrary to the above, during the inspection conducted on August 9 and 10, 1989, records of leak tests of two cesium-137 sealed sources (Serial Nos. S596 and S595) performed during April 1988 and April 1989 were not available.

   This is a Severity Level V violation. (Supplement VI)

4. 10 CFR 35.59(g) requires, in part, that a licensee shall conduct a quarterly physical inventory of all sealed sources in its possession and shall retain records of such inventories for 5 years.

   Contrary to the above, during the inspection conducted on August 9 and 10, 1989, records of physical inventories of two sealed sources performed

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during the first, second, and third quarters of 1988 and the first quarter of 1989 were not available.

This is Severity Level V violation. (Supplement VI)

5. 10 CFR 35.70(h) requires, in part, that a licensee shall retain a record of each survey required in § 35.70 for a period of 2 years. Additionally, records of surveys performed to detect removable contamination must include the detected removable contamination expressed in disintegrations per minute per 100 square centimeters.

Contrary to the above, during the period from January 1988 to the date of this inspection, results of surveys performed to detect removable contamination had been recorded with detected contamination expressed in counts per minute per 100 square centimeters rather than disintegrations per minute as required.

This is a Severity Level V violation. (Supplement VI)

Pursuant to the provisions of 10 CFR 2.201, Veterans Administration Medical Center is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 29th day of August 1989