

DCD / DCB

NOV 02 1989

03002283

St. John's Mercy Medical Center
ATTN: Sister Angelique
Vice President
615 South New Ballas Road
St. Louis, MO 63141

License No. 24-00794-03
License No. SNM-1752

Gentlemen:

This refers to the routine safety inspection conducted by James R. Mullauer, M.H.S. of this office on September 27 and 28, 1989, to the discussion of our preliminary findings with you and members of your staff at the conclusion of the inspection and to the receipt of information on October 13, 1989, from Dr. Lindeman of your staff pertaining to License No. SNM-1752.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and with the conditions of your license. The inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel. The inspection also included a review of the 55 Rem extremity badge exposure reported to the NRC Region III office in letter dated April 20, 1989. Based on our review of the incident, we agree with your conclusion in hypothesis No. 1 that the 55 Rem exposure occurred to the finger badge and not to the individual's extremity. We also agree with your conclusion that the individual probably received a calculated hand exposure of 5,144 millirem during January and February 1989. We have no further questions regarding this matter.

During this inspection certain of your activities appeared to be in violation of NRC requirements for license No. 24-00794-03 as specified in the enclosed Notice. A written response is required. No violations were identified with regards to License No. SNM-1752. However, as was discussed with you at the conclusion of this inspection, we are concerned over the lack of management attention given to your licensed programs. This lack of attention appears to be a contributing factor in the number of violations identified under License No. 24-00794-03. With regard to License No. SNM-1752, this lack of management attention is evidenced by the fact that on various occasions in the past, information provided to the NRC by your Radiation Safety Officer with regard to the number of patients with implanted pacemakers was inconsistent. These inconsistencies were discussed with you during our inspection effort and were not clarified until October 13, 1989, when we received and reviewed a summary of your pacemaker program from Dr. Lindeman of your staff. Consequently, in your response to the enclosed notice, please describe those actions taken or planned to be taken to improve the management effectiveness over both of your licensed programs. Enclosed is Appendix B, "Management Control" to provide you with some guidance for your response.

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In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the accompanying Notice are 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.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Bruce S. Mallett, Ph.D., Chief
Nuclear Materials Safety Branch

Enclosures:

- 1. Appendix A; Notice of Violation
- 2. Appendix B; Management Control

cc w/enclosures:
DGD/DCS (RIUS)

RIII
GLS for
Mullauer/jh
10/26/89

RIII
GLS for
Caniano
10/26/89

RIII
Grobe
10/30

YAO
RIII
As
Mallett
11/2/89