

NOV 14 1989

License No. 04-12727-02

Department of the Army
United States Army Health Professional Support Agency
5109 Leesburg Pike
Falls Church, Virginia 22041-3258

Attention: Charles E. Day, III
Lieutenant Colonel, United States Army
Radiological Hygiene Consultant

Gentlemen:

In response to your letter dated October 10, 1989, it should be noted that the corrective actions identified by the NRC during the inspection, and agreed to by Colonel William F. Tuer, have already been resolved. The only question that remains to be clarified is whether the citation was based on a regulatory requirement and would therefore have generic implications at other Army installations.

The basis of issuing the citation was to insure that nurses and orderlies who transport and/or care for inpatients who have received significant diagnostic doses of licensed material receive at least as much instruction as the licensee now gives to ancillary personnel such as housekeeping. The inclusion of nurses in general radiation safety training is standard health physics practice at medical institutions. This training usually takes the form of a brief lecture, slide, or video presentation during annual inservice sessions where numerous other training topics are presented.

During discussions with personnel and observations in the Nuclear Medicine Department, the inspector noted that nurses and orderlies were not prohibited from entering areas where radioactive material is used. During the inspection an orderly was observed in the injection area having discussions with the Chief Nuclear Medicine Technologist.

Appendix A of the NRC Regulatory Guide 10.8, Revision 2, includes nurses as ancillary personnel and specifies their need to be informed about radiation hazards and appropriate precautions. Your annual refresher training should include the nurses and orderlies and anyone else who's duties may require working in the vicinity of radioactive material.

The two questions at the end of Colonel Tuer's September 5, 1989 letter are not a contradiction. The training and precautions for patient care staff are necessary because of the potentially frequent contact that occurs with these patients and, thereby, the potentially higher level of exposure to the staff members.

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If you have further questions or comments concerning this matter please contact this office.

Sincerely,

original signed
Robert J. Pate, Chief
Nuclear Materials Safety and
Safeguards Branch

cc: Department of the Army
Silas B. Hayes U.S. Army Hospital
Fort Ord, California 93941
Attn: William F. Tuer
Colonel, Medical Corps
Deputy Commander for Clinical Services

bcc w/copy of letter dated 10/10/89:

file copy
B. Faulkenberry
J. Martin
A. Johnson
J. Zollicoffer

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JMontgomery *RJP*
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YES / <u>NO</u>	YES / <u>NO</u>

SEND TO PDR
YES / <u>NO</u>