



DEPARTMENT OF THE ARMY
HEADQUARTERS U.S. ARMY MEDICAL DEPARTMENT ACTIVITY (MEDDAC) FORT ORD
FORT ORD, CALIFORNIA 95941-5800

September 5, 1989

REPLY TO
ATTENTION OF:

Preventive Medicine Service

SUBJECT: NRC License #04-12727-02 (Docket # 030-08367) Inspection Response

THRU: Commander
U.S. Army Health Services Command
ATTN: HSCL-P
Ft Sam Houston, TX 78234-8000

Headquarters, Department of the Army
ATTN: DASG-PSP-E
5109 Leesburg Pike
Falls Church, VA 22041-3258.

TO: United States Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Dear Sir:

Pursuant to your letter dated 9 August 1989 (enclosure), the following reply is forwarded.

The finding cited in the referenced letter was in regards to our training of hospital staff that may be involved with the transportation or care of inpatients at the hospital who have received diagnostic doses of radiopharmaceuticals.

Following are the corrective steps that will be instituted by Silas B. Hays U.S. Army Hospital no later than 01 November 1989:

1. Give a radiation information class to educate the current medical staff.
2. Become a part of the monthly newcomers briefing to educate all new medical personnel.

Even though the hospital is instituting a more thorough training program to include these personnel, a clarification of the finding is requested. The request is based on the following observations:

1. The only workers in the hospital as defined in 10 CFR part 19.3, are: the Nuclear Medicine staff, the authorized users in the Department of Radiology, the Health Physics staff, and the ward personnel who are involved in therapy doses of radiopharmaceuticals. Our current license requires the training of all of these personnel.

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2. The only restricted area in the hospital, as defined in 10 CFR part 19.3, is the Nuclear Medicine Clinic Hot Lab. This area is not where the nursing staff takes the patients in question. They are brought to, and picked up from, the Nuclear Medicine Clinic office. While in the Nuclear Medicine Clinic area, the Nuclear Medicine staff transports and cares for them.

3. Our license describes in detail, in Appendixes G & N, who the hospital considers ancillary personnel to be and who we will train. Our license was approved and accepted by the Commission on 3 Oct 1986; and has been amended on the following dates: 15 Sep 86, 27 Oct 86, 15 Sep 87, and 9 Jun 89. The 9 Jun 89 amendment was not officially approved by the Commission until 21 Aug 89, almost a full month after the inspection, and no mention was made in that correspondence that our training requirements were found to be either lacking in scope or to be in noncompliance with Commission regulations.

4. 10 CFR part 35.75 states "A licensee may not release from confinement for medical care any patient administered a radiopharmaceutical until either, (1) . . . ; or (2) The activity in the patient is less than 30 millicuries." The maximum diagnostic dose given at this hospital is less than 30 millicuries.

5. The outpatient clients of the Nuclear Medicine Clinic, who receive the same types of diagnostic doses as the inpatients, are allowed to come and go as they please with no restrictions and no special precautions for the people they will be near. The inpatient clientele of Nuclear Medicine comprise approximately 20% of their total patient load.

These last two statements appear to be in contradiction with each other.

✓ 1. If the inpatient clients are a radiation hazard, requiring the training of the staff, why are the outpatient clients not required to be hospitalized?

✓ 2. If the outpatient clients (and therefore, the inpatient clients) are not a radiation hazard, why does the nursing staff, who transports and cares for the inpatient clients, need to be trained?

A copy of this letter will be forwarded directly to United States Nuclear Regulatory Commission, Region V, 1450 Maria Lane, Suite 210, Walnut Creek, California 94596 due to the limited time constraints, to allow action to begin prior to the arrival of the copy sent thru command channels.

FOR THE COMMANDER:


William F. Tuer
Colonel, Medical Corps
Deputy Commander for Clinical Services

1 Enclosure

Copy Furnished:

United States Nuclear Regulatory Commission, Region V