

In Reply Refer To:
License: 35-14046-02
Docket: 30-12154/89-01

NOV 15 1989

St. Joseph Regional Medical Center
of North Oklahoma, Inc.
ATTN: Garry L. England
President
14th and Hartford
Ponca City, Oklahoma 74602

Gentlemen:

Thank you for your letter of October 10, 1989, in response to our letter and attached Notice of Violation both dated September 27, 1989. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine whether full compliance has been achieved and will be maintained.

Sincerely,

Yandell for:

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

cc:
Oklahoma Radiation Control Program Director

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

RIV:NMIS~~OK~~
WLHolley:ch
11/13/89

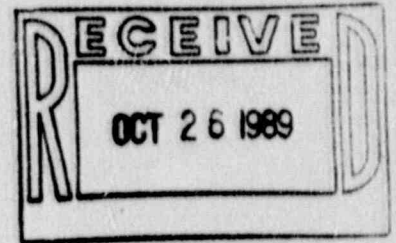
C:NMIS~~OK~~
CLCain
11/13/89

D:DRSS
ABBeach
11/15/89

IE07
11

ST. JOSEPH REGIONAL MEDICAL CENTER OF Northern Oklahoma, Inc.
14th and Hartford • P.O. Box 1270 • Ponca City, OK 74602

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Docket: 30-12154/89-01
Date: October 10, 1989



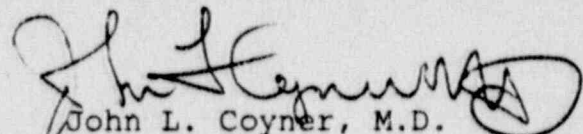
United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Gentlemen:

This letter is in response to the written notice of violation received during the unannounced radiation safety inspection conducted by Mr. Wesley L. Holley on August 28, 1989. At that time, two violations of 10 CFT 35.204 were discovered. At the time of the violations, the technologist responsible for the daily elution and patient injections, was still under the assumption that the old standard of 1.0uCi molybdenum-99 per 1.0mCi of technetium-99m, not to exceed 5uCi of molybdenum per patient dose, was the accepted NRC allowance. These two elutions would not have intentionally been used for patient injections, but instead been discarded and a new elution would have been drawn for patient use, provided it was within the acceptable limits. Soon after the last instance cited, which was July 1, 1988, the technologist responsible was informed of the change in NRC accepted molybdenum-99 allowances. No technetium-99m elution with molybdenum levels above 0.15uCi of molybdenum-99 per 1.0mCi technetium-99m has been used for patient injections since July 1, 1989. According to our records, no elutions have been above 0.15uCi of molybdenum per 1.0mCi of technetium-99m since July 1, 1988.

Since the inspection of August 28, 1989, all personnel working in the Nuclear Medicine department have been instructed to read all NRC notices very carefully and implement any changes immediately into our standard policies and procedures. We foresee no future incidents involving the violation of 10 CFR 35.204.

Sincerely,


John L. Coyner, M.D.
Chief Radiologist
SJRMC

~~39-110601-26~~ sp.

IC-89-665

IE07

SEP 27 1989

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License: 35-14046-02
Docket: 30-12154/89-01

St. Joseph Regional Medical Center
of North Oklahoma, Inc.
ATTN: Garry L. England, President
14th and Hartford
Ponca City, Oklahoma 74602

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Mr. Wesley L. Holley of this office on August 28, 1989, of the activities authorized by NRC Byproduct Material License 35-14046-02, 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, independent measurements, and observations by the inspector.

During this 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 inspector also reviewed the actions you had taken with respect to the violation observed during our previous inspection conducted on March 3-4, 1986. He verified that the corrective actions for this violation had been implemented.

The response directed by this letter and the 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.

RIV:NMIS~~all~~
WLHolley:ap
9/27/89

C:NMIS~~all~~
CLCain
9/27/89

C:NMSB~~1,2,3~~
WLFisher
9/27/89

~~9910040355~~ 2pp.

IE-07

St. Joseph Regional Medical Center -2-
of North Oklahoma, Inc.

Should you have any questions concerning this letter, 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:
Oklahoma Radiation Control Program Director

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

*w/766

APPENDIX

NOTICE OF VIOLATION

St. Joseph Regional Medical Center
of North Oklahoma, Inc.
Ponca City, Oklahoma

Docket: 30-12154/89-01
License: 35-14043-02

During an NRC inspection conducted on August 28, 1989, a violation of NRC requirements was 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 violation is listed below:

10 CFR 35.204 prohibits the administration to patients of technetium-99m containing more than 0.15 microcurie of molybdenum-99 per millicurie of technetium-99m at the time of administration.

Contrary to the above, on March 20 and July 1, 1988, technetium-99m containing respectively 0.384 and 0.20 microcuries of molybdenum-99m per millicurie of technetium-99m was administered to patients.

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

Pursuant to the provisions of 10 CFR 2.201, St. Joseph Regional Medical Center of North Oklahoma, Inc., 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 27th day of September 1989

~~35-14043-02~~ 10.