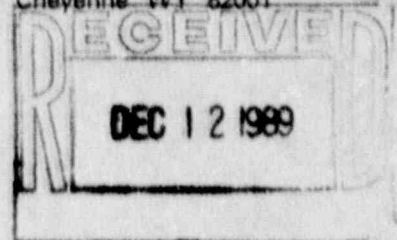




**Veterans
Administration**

December 6, 1989



In Reply Refer To: 442/00

U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Gentlemen:

The following refers to the findings of noncompliance reported in your Notice of Violation resulting from the inspection of our facilities in October, specifically, the finding that neither the RSC nor the RSO had performed annual reviews of the radiation safety program.

Contrary to that finding, quarterly audits of all radiation safety activities have been performed and actions taken to correct any identified deficiencies. The audits included reviews of exposure and use records in compliance with the medical center's ALARA program. The results have been reported by exception to the authorized user(s) and the Committee.

The NOV correctly states that the Committee had not performed annual audits. The annual audits were not implemented for the following reasons:

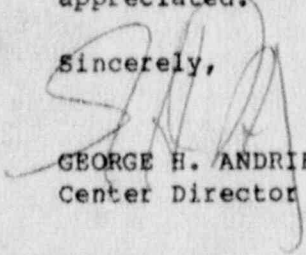
(a) It was our understanding the provisions of the "new" Part 35 were not binding until a byproduct license had been renewed. Our renewal and/or transfer of license responsibility has not been acted upon, and

(b) for a long period there have been discussions, which have only recently taken shape, concerning the transfer of license responsibility to the Committee of the St. Louis VAMC. The uncertainty concerning the local Committee's role resulted in less than full implementation of normal committee responsibilities.

However, since the compliance inspection, a full review of all audit findings has been conducted by the Committee. This activity will continue as required until such time as the responsibility is transferred to the St. Louis committee.

If there are further questions concerning this matter, please do not hesitate to contact us. Your continued interest in our program is appreciated.

Sincerely,


GEORGE H. ANDRIES, JR.
Center Director

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IC-89-712

"America is #1—Thanks to our Veterans"

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