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April 27, 1981

Mr. William P. Reichhold U. S. Nuclear Regulatory Commission Region III 799 Glen Ellyn, Illinois 60137

Re: License No. 34-18731-01

Dear Mr. Reichhold:

Columbus Ohio 438 6 614.221.7671

This letter is in response to the questions you raised relative to the operation of our nuclear medicine operation.

Enclosed is a copy of the minutes of the dadiation Control Committee Meeting dated October 28, 1980. At this meeting the corrective actions were discussed and the projected dates of implementation selected. Specifically in response to Appendix A of your letter, we are detailing the actions taken as follows:

- 1. Badges for physicians were received on November 20, 1980. Finger badges were received on March 1, 1981. -
- 2. Polkage survey records were implemented in the R!A lab (in vitro testing) February 4, 1981, and in the in vivo testing/therapy area on March 12, 1981.
- 3. Area survey records were implemented in the RIA lab (in vitro testing) February 4, 1981, and in the in vivo testing/therapy area on March 13, 1981. Areas are surveyed each day of use. Note: The in vivo testing and therapies were terminated on October 16, 1980, and they commenced on March 13, 1981.
- 4. Dose assay records were implemented on March 13, 1981, when the first therapy mentioned above was given. - o.k.
- 5. The survey meter was calibrated March 10, 1981 and dose calibrator was calibrated December 9, 1980. - 4
- 6. The Radiation Control Committee has been reorganized and meetings have been documented October 28, 1980, December 12, 1980, and March 9, 1981. The next scheduled meeting will be held in the second quarter of 1981.
- 7. Survey records for the disposal of the I-125 tubes used in the in vitro testing were implemented on February 6, 1981. - C.K.

We are enclosing for your convenience a copy of the ALARA program which is in operation at the clinic at the present time. You will note that it outlines the duties and responsibilities of the Radiation Control Committee, the Radiation Safety Officer and the radiologic physicist.

Mrs. Naomi Tokar is the supervising technologist in the laboratory. She is a registered medical technologist with special training in RIA and thyroid technology. All technical procedures involving therapeutic uses of I-131 are performed by Mrs. Tokar. Three other medical technologists under supervision of Mrs. Tokar work with the radioimmunoassay procedures. A nuclear medicine procedure manual is in the department and available for reference of the medical technologist.

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As a part of our review of the department operation, we are implementing continuing training of the technologists and other personnel in the safety of radionuclides, both informally and in more structured formats. A log is kept of the sessions, including the material covered and the persons in attendence. In event of personnel changes individualized orientation and training will be carried out both by the supervisory technologist, the radiologic physicist and the radiation safety officer, to insure competence before permitting an individual to work with radionuclides.

All equipment is checked every day of use with reference sources for constancy by the technologist. In the event of any change in constancy, the radiologic physicist is notified immediately and the situation is investigated. The calibrations are performed at least annually by him or under his direction. In addition, he reviews the constancy checks and minor calibrations when he is in the department at other times during the year.

I hope these comments will answer your questions. We feel we really have the situation under control with a good continuing program of auditing and management control, and with responsible technologists working in the clinical

MARSHALL M. BAKER, FACMGA Executive Director

State of Ohio ) SS County of Franklin )

Before me, a Notary Public in and for said state, personally appeared the above named Marshall M. Baker who acknowledged that he did sign the foregoing instrument and that the same is his free act and deed. In Testimony Whereof, I have hereunto affixed my name and official seal at Columbus, Ohio, this 28th day of April, 1981

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MARY JEAN CURTO
SCIARY PUBLIC, STATE OF OHIO
STY COMMISSION EXPIRES INLY 4. 1985