



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137



MAY 4 1981

Brinton C. Donalson, D.O.
609 E. Jolly Road
Lansing, MI 48910

License No. 21-15508-01

Dear Dr. Donalson:

This refers to the routine safety inspection conducted by Ms. E. Matson of this office on February 24, 1981, of activities at your clinic authorized by NRC Byproduct Material License No. 21-15508-01 and to the telephone discussion with you on March 4, 1981.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and with the conditions of your license. The inspection consisted of a selective examination of procedures and representative records, observations, independent measurements, and interviews with personnel.

During this inspection, certain of your activities appeared to be in non-compliance with NRC requirements, as described in the enclosed Appendix A, and a written response is required.

In addition to the above areas, this inspection included a review of corrective actions taken in response to items of noncompliance identified during our January 12, 1979, inspection. We are concerned that noncompliance items No. 4 and 5 of the attached Appendix A were identified in that inspection also and corrective actions described in your letter dated February 25, 1979, were not instituted. We feel that an apparent lack of management control over your licensed activities has allowed these items to remain uncorrected and others to occur. Therefore, in your response to this letter, please describe the administrative controls you will initiate to assure these and the other items of noncompliance are corrected and do not recur.

As a result of recent and previous inspection findings an enforcement conference was held at Region III on March 18, 1981. The current NRC enforcement policy and the items of noncompliance in Appendix A were discussed. Since these violations occurred when the previous enforcement policy was in effect, no escalated enforcement was appropriate. Had the overexposure described in Appendix A occurred several months later, the new enforcement policy would have probably resulted in a civil penalty. We also discussed how repeated violations can result in escalated enforcement.

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Brinton C. Donalson, D.O.

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We will gladly discuss any questions you have concerning this inspection.

Sincerely,


James G. Keppler
Director

Enclosure: Appendix A,
Notice of Violation

cc: LFMB, ltr only

cc w/encl:
Central Files
Reproduction Unit NRC 20b
PDR
NSIC