



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
BOLLING AFB DC 20332-6188

DEC 22 1989

15 DEC 1989

REPLY TO: AFOMS: SGPR
ATTN OF: BROOKS AFB TEXAS 78235-5000

SUBJECT: Response to Notice of Violation (NOV) - USAF Radioactive Material Permit No. 08-08401-1AFP, Docket No. 030-01331 Issued Under USNRC Master Materials License No. 42-23539-01AF, Docket No. 030-28641

TO:
USNRC, Rgn IV
ATTN: Mr. William Fisher
611 Ryan Plaza Drive, Suite 1000
Arlington TX 76011-4010

1. Please reference your 11 Dec 89 telecon with Col Wood. Attached is the permittee's response to the NOV.
2. With regard to the violation which identified (i) failure to perform surveys where radiopharmaceuticals were routinely prepared for use or administered on weekends and (ii) documentation of decay-in-storage waste for ten half lives, we believe that the permittee's response satisfactorily addresses the reasons why the violation occurred, the corrective steps taken, corrective actions to preclude recurrence and the date achieved.
3. We have also received the permittee's response regarding the lost personnel dosimeter issue raised in NRC's letter dated 17 Nov 89 but wish to withhold the response, pending further information from the permittee and our evaluation and review in conjunction with information provided by the Air Force Occupational and Environmental Health Laboratory (AFOEHL). We anticipate providing you a response shortly, but not later than 16 Jan 1990.
4. Please call us if you have any questions at (512) 536-3331.

Lawrence Donovan

LAWRENCE DONOVAN, Maj, USAF, BSC
USAF Radioisotope Committee
Office of the Surgeon General

1 Atch
MGMC/SGHRN Ltr, Nov 30,
1989

cc: HQ USAF/SGP w/o Atch
HQ MAC/SGPB w/o Atch
MGMC/SG/SGA/SGH/SGP/
SGHR/SGPB w/o Atch

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DEPARTMENT OF THE AIR FORCE

MALCOLM GROW USAF MEDICAL CENTER (MAC)

ANDREWS AIR FORCE BASE DC 20331-6300

NOV 30 1989

REPLY TO
ATTN OF:

SGHRN (Maj. Krasicky, AV858-2616)

SUBJECT:

Response to Notice of Violation-USAF Radioactive Material Permit
No. 08-08401-1AFP, Docket No. 030-28641

TO:

SGHR *gt*
SGA *gt*
SGH *gt*
SG *gt*
AFOMS/SGPR
Brooks AFB, TX 78235-5000
IN TURN

1. Reference your attached letter of 21 NOV 89 requesting a written response to an NRC Notice of Violation at Malcolm Grow USAF Medical Center dated 17 NOV 89. Responses below correspond to the paragraph indices of each violation referenced in the Notice.

A. Failure to survey areas where radiopharmaceuticals were routinely prepared for use or administered on weekends.

1. While this requirement had been met routinely during normal duty hours, failure to document the appropriate surveys on weekends and holidays for on-call procedures had been overlooked due to ignorance of the specifics of the requirement.

2. The department operating instructions now reflect the change in documentation requirements such that survey readings will be recorded prior to close of business on both duty and non-duty days when radiopharmaceuticals are prepared or administered.

3. Technicians failing to meet the above requirements will be counseled and/or disciplined as deemed necessary by the RSO.

4. Full compliance has been achieved as of 1 OCT 89.

UNITED STATES AIR FORCE



SEPTEMBER 18, 1947



B. Failure to document decay-in-storage of I-131 waste from I-131 therapy patients for the required ten half-lives.

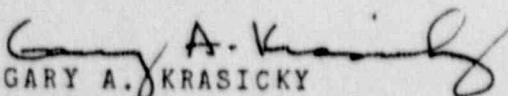
1. Prior to the inspection conducted on 21 SEP 89, department policy was to hold all I-131 waste until background radiation levels were recorded on routine surveys. Ignorance of the ten half-life requirement resulted in trash being held until background levels were recorded, but not necessarily for ten half-lives.

2. Departmental operating instructions now require that all byproduct waste, including I-131 waste from therapy patients, be dated and logged in appropriately such that the ten half-life decay-in-storage requirement is documented.


3. Technicians failing to meet the above requirements will be counseled and/or disciplined as deemed necessary by the RSO.

4. Full compliance has been achieved as of 1 OCT 89.

2. If any further information is desired, please contact me.


GARY A. KRASICKY
MAJOR, USAF, MC
Chief, Nuclear Medicine Service
Radiation Safety Officer

Reviewed By:


GEORGE W. SCHLOSSNAGLE
MAJOR, USAF, BSC
Chief, Bioenvironmental Engineering Services
Base Radiation Protection Officer

cc HQMAC/SGPB