

ELKVIEW general hospital



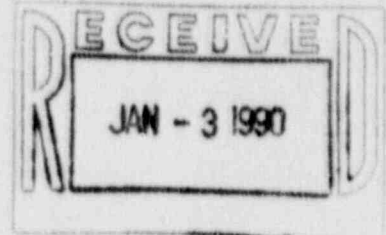
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HOBART, OKLAHOMA 73651

December 29, 1989



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

Re: License No. 35-23461-01
Docket: 30-22215/89-01

Gentlemen:

This letter is in reply to your December 7, 1989 letter regarding your inspection of our facilities on August 24 and 25th, 1989.

We have instituted several changes that will demonstrate active changes in the program just prior to and after your Regulatory visit in August. The first of the changes was changing our Radiation Safety Officer to an on-site person. Essentially at the same time we changed our Nuclear Medicine technologists. We also retained a consulting Physicist. These changes started in June of 1989 and were either in place or in process at the time of your August inspection.

We will reply specifically to each item in your notice of violation in the same order as the appendix attached to your letter.

1. With regard to diagnostic misadministration, the new Radiation Safety Officer is familiar with the rules and requirements for misadministration reporting. If there is any question(s) this will be discussed with the consulting Physicist and immediately reported to the Nuclear Regulatory Commission. This will be reviewed on a quarterly basis as to status by both the Radiation Safety Committee and the consulting Physicist.
- 2a With regard to the annual radiation safety review by the Radiation Safety Officer the new Radiation Safety Officer will prepare an annual review for the committee. The annual meeting of our Radiation Safety Committee is in March.
- 2b Our consulting Physicist will handle the radiation safety inspection services for our employees. Our last in-service was done by the consulting Physicist on September 29, 1989. This will be done annually in September. New Employees that work in Nuclear Medicine that frequent the area will be given an in-service by the Radiation Safety Officer and then attend the annual in-service. The annual in-service date will be reviewed by the Radiation Safety Committee and the consulting Physicist.

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- 2d. Items 1, 2, and 3, dose calibrator linearity and accuracy was completed by the consulting Physicist on July 10, 1989. All tests at that time were in order. The geometric variation on the dose calibrator was completed on December 21, 1989. The consulting Physicists had noted that the geometric variation on file was from March 23, 1989, but did not know about the repair of the unit in August of 1988.

With regard to the dose calibrator all tests on the dose calibrator are current and the instrument is working properly. This data will be contained in the Physics reports reviewed by the Radiation Safety Officer and the Committee.

- 2e. Radioactive packages are delivered to the hospital typically on Saturday. An employee has been instructed on how to survey these packages immediately. This data is also recorded on a radioactive shipment receipt form which was instituted at approximately the same time as the inspection. This data will be reviewed by the consulting Physicist and reported to the Radiation Safety Committee on a quarterly basis.
3. The Radiation Safety Committee minutes will indicate the members present and the members absent at each quarterly meeting. As previously mentioned the annual meeting of the committee is in March.
4. A new waste disposal form has been instituted. This was instituted in September. There have been three disposals recorded on the new form at this time. This form was set up by our consulting Physicist and includes information required to insure that the radio-active material is properly disposed of. This will be reviewed on a quarterly basis by our consulting Physicist.

We recognize certain problems in our Radiation Safety program and have begun to take steps to make changes just prior to your August inspection. The first of these changes was instituted in June with the hiring of a Nuclear Medicine technologist. In July we hired a consultant Physicist who will be on-site for quarterly visits. At his first visit, he worked on the renewal of our radioactive materials license and suggested changing the Radiation Safety Officer to a person who would be on-site and take a more active role in review and hands-on operation of the program. At the time this letter was written, all observed violations are now corrected and most were corrected at the time of the inspection.

We have also instructed our consulting Physicist to prepare an audit sheet in addition to his regular report, where he specifically reviews on a quarterly basis the status of the inspections identified by you on August, 1989. This sheet will be presented to the Radiation Safety Committee and will be reviewed and signed by the consulting Physicist, the Radiation Safety Officer and the hospital Administrator. We plan on continuing this audit sheet to ensure that our program has no further problems with these areas identified.

If you or your staff have any questions concerning our response, or if you need any additional information, please do not hesitate to call.

Sincerely,

Vernon E. Dennino, R. T.
Vernon E. Dennino
Radiation Safety Officer

cc: J.W. Finch, Administrator