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syncor[®]

Syncor Corporation
License No. 21-17189-01MD
December 26, 1989

Lic. File
21-17189-01MD

Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

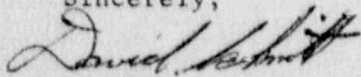
Gentlemen:

Pursuant to the provisions of 10 CFR 2.201, the following are the corrective measures implemented to rectify certain activities in violation of NRC requirements as stated in December 12, 1989 audit;

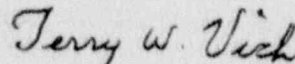
1. We currently inspect all kits prepared by dual verification. This has been in effect since April, 1988. Results are in compliance with License Condition No. 20 as stated in Items 10.13 and 10.15, since this change has been implemented.
2. In response to violation of License Condition No. 20, referenced letter dated April 6, 1988 all personnel have been informed of company policy regarding personal cars for emergency deliveries effective 10-20-89. The company policy is stated in Supplement I.
3. In reference to License Condition No. 20; Item 10.8 regarding emergency procedures found in Appendix I to avoid further non-compliance, an employee meeting was held on Oct. 27, 1989. A review of proper procedure for cleaning minor spills of radioactive material was presented by David Schmitt. The procedure also is posted on a bulletin board outside restricted area. The procedure is stated in Supplement II. Successful results have been achieved effective October 4, 1989.

We will gladly discuss any questions you have concerning these inspections.

Sincerely,



David Schmitt
Pharmacy Manager



Terry Vich
Assistant Manager

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Innovators in high-tech pharmacy services

Syncor International Corporation • 10646 Northend Avenue • Ferndale, MI 48220
Medical Services Group • (313) 543-8400

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Supplement I

To: Medical Service Group Managers
From: Frank M. Comer
Re: Use of Personal Cars For Emergency Deliveries
Date: 10/20/89

Cars owned or used for personal purposes may be used for "Emergency Delivery" of Radiopharmaceuticals.

If you use your car for this purpose all deliveries must be handled in accordance with DOT and regulatory requirements. This requires that you have:

1. A copy of "The Emergency Procedures In Case Of An Accident" in the vehicle.
2. The "Emergency Notification" sign in the window of the vehicle.
3. Provisions for securing the package or packages to prevent shifting during delivery.

It will be necessary for you to check your state regulations or RAM license application to determine if you are required to perform a survey of the vehicle, if used for RAM deliveries, before releasing it for personal use. The state of Texas requires that all vehicles which are used for RAM deliveries and then for personal use must have surveys performed and the results documented prior to releasing them for personal use. Standards of good practice dictate that you should perform and document such surveys.

All private cars being used at the request of Syncor for emergency RAM deliveries are covered by the companies liability insurance.

Supplement II

SYNCOR EMERGENCY PROCEDURES IN CASE OF SPILLS OF RADIOACTIVE MATERIALS

Minor Spills

1. NOTIFY: Notify persons in the area that a spill has occurred.
2. PREVENT THE SPREAD: Cover the spill with absorbent paper.
3. CLEAN UP: Use disposable gloves and remote handling tongs. Carefully fold the absorbent paper and pad. Insert into a plastic bag and dispose of it in the radioactive waste container. Also, insert into the plastic bag all other contaminated materials, such as disposable gloves.
4. SURVEY: With a low-range, thin-window G-M survey meter, check the area around the spill, hands, and clothing for contamination.
5. REPORT: Report the incident to the Radiation Safety Officer, David Schmitt, or the pharmacist in charge if David Schmitt is not here. (Terry Vich)

Major Spills

1. CLEAR THE AREA: Notify all persons not involved in the spill to vacate the room.
2. PREVENT THE SPREAD: Cover the spill with absorbent pads, but do not attempt to clean it up. Confine the movement of all personnel potentially contaminated to prevent the spread.
3. SHIELD THE SOURCE: If possible, the spill should be shielded, but only if it can be done without further contamination or without significantly increasing your radiation exposure.
4. CLOSE THE ROOM: Leave the room and lock and door(s) to prevent entry.
5. CALL FOR HELP: Notify the Radiation Safety Officer or the pharmacist in charge.
6. PERSONNEL DECONTAMINATION: Contaminated clothing should be removed and store for further evaluation by the Radiation Safety Officer. If the spill is on the skin, flush thoroughly and then wash with mild soap and lukewarm water.

RADIATION SAFETY OFFICER: DAVID SCHMITT 795-0492

OFFICE PHONE: 313-543-8400 HOME PHONE: (Use Office Number)

ALTERNATE NAMES AND TELEPHONE NUMBERS DESIGNATED BY RADIATION SAFETY OFFICER:

DAVID SCHMITT 795-0492