

FEB - 2 1990

In Reply Refer To:
License: 35-13435-01
Docket: 030-02927/89-01

Hillcrest Health Center
ATTN: Wanda Lewellan, Administrator
2129 South 59th Street
Oklahoma City, Oklahoma 73119

Gentlemen:

This refers to the routine safety inspection conducted by Mr. S. Rajendran and Ms. L. L. Kasner of this office on October 30, 1989, and January 5, 1990, of the activities authorized by NRC Byproduct Material License 35-13435-01. The findings of this inspection were reviewed with your Hospital Administrator, the Director of Radiology, the Radiation Safety Officer (RSO), and other members of your staff at the conclusion of the inspection. The enclosed NRC Inspection Report 030-02927/89-01 documents this inspection.

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

During this inspection, certain of your activities were found not to be conducted in full compliance with NRC requirements. Consequently, you are required to respond to this matter in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation enclosed with this letter.

The inspectors also reviewed the actions you had taken with respect to five violations observed during our previous inspection conducted on May 22, 1986. They verified that the corrective actions for three of these violations had been implemented as stated in your reply dated July 28, 1986. However, they noted that two violations have recurred since the previous inspection. These items are discussed in Sections 4 and 5 in the attached inspection report. The inspectors also reviewed corrective actions that you had implemented subsequent to our discussion held with members of your staff after the initial portion of the inspection conducted on October 30, 1989. These actions are discussed in the inspection report enclosed with this letter.

As indicated during the telephone discussion on December 20, 1989, between myself, Ms. L. L. Kasner, and members of your staff, we are concerned in regard to the number of violations identified during this inspection. As we discussed, these violations seemed to have occurred because you had designated

*RIV:NMIS	*NMIS	*C:NMIS	*EO	*D:DRSS
SRajendran:lm	LLKasner	CLCain	GFSanborn	ABBeach
/ /90	/ /90	/ /90	/ /90	/ /90

*Previously Concurred

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many of the RSO's duties to be performed by your consulting medical physicist. Although the performance of these tasks may be designated to another individual and subsequently reviewed by the RSO, it must be emphasized that the RSO is responsible for the overall effectiveness and compliance of the radiation safety program with the Commission's rules and regulations and conditions of your license.

As noted in the enclosed inspection report, the inspectors observed that subsequent to the first day of the inspection you employed two additional medical physicists to provide services related to your byproduct materials program. The services provided by these individuals appear to have been beneficial in correcting some specific items of noncompliance identified during this inspection. However, as reviewed with you at the conclusion of this inspection, although the regulations permit delegation of specific tasks, the responsibility of radiation safety program review and management remains incumbent upon the RSO and hospital administration.

It is necessary that the responsible staff at Hillcrest Health Center focus more attention to detail in all aspects of the radiation safety program. Consequently, in your reply to this letter, you should describe these specific actions planned or taken to improve the effectiveness of your licensed operations with particular emphasis on measures currently being taken to prevent further violations.

The response directed by this letter and the accompanying notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:

A. B. BEACH

A. Bill Beach, Director
Division of Radiation Safety
and Safeguards

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report
030-02927/89-01

cc:
Oklahoma Radiation Control Program Director

bcc: (see next page)

Hillcrest Health Center

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bcc:

DMB - Original (IE-07)
LShea, RM/ALF (AR-2015)
*WLFisher
*MIS System
*RSTS Operator
JLieberman

RDMartin
LAYandell
*SRajendran
*LLKasner
*REHall, URFO

ABBeach
*CLCain
*NMIS
*RIV Files (2)
*GFSanborn

*W/766