

MEDSCAN

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September 11, 1989

Mohamed M. Shanbaky, Chief
Nuclear Materials Safety Section A
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Docket No. 030-03806
License No. 37-28281-081

Dear Dr. Shanbaky:

On behalf of Medscan Incorporated, I am responding to a recent "Notice of Violation" issued to the Lawrence Park Imaging Center for deficiencies found during an inspection on June 2, 1989. I understand the numerous violations has prompted your concern for the radiation safety program at this facility. We have promptly addressed the situation in a recent amendment by requesting the appointment of another Radiation Safety Officer.

The individuals primary duties would encompass those described in 10CFR 35.21 for three facilities presently under the direction of Medscan Inc., Lawrence Park Imaging Center included. We are very confident that the corporate decision to designate Maliyil Mammen Koshy, Ph.D as the Radiation Safety Officer for this facility will correct the apparent lack of oversight of our program found during the inspection. A copy of the amendment request describing our intentions is attached. Our resolution of the problems identified in Appendix A are as follows:

A. The Nuclear Medicine Technologist has been instructed in the applicable provisions of the regulations and conditions. The technologists is aware of the location of the NRC license, terms of the license and the pertinent rules. Instruction will be given during an annual refresher training, and whenever there is a significant change in duties, regulations, or the terms of the license.

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B.1 The procedure for safely opening packages containing radioactive material will include a wipe test of the final source container and evaluation for radioactive contamination. We will review the records periodically to assure compliance is maintained. (see attached memo to technologist).

B.2 The conditions of our NRC license state that area survey procedures must be reviewed by the Radiation Safety Officer at least monthly. We request that the frequency be changed to at least monthly. We request that the frequency be changed to at least quarterly. The monthly requirement was an oversight on our part when we originally submitted the application for new license (appendix N). A quarterly review is acceptable according to Regulatory Guide 10.8 Appendix G. Although this request may come at a time when our program seems to lack control, our attempt to designate the new Radiation Safety Officer and formulate an internal audit program will hopefully convince you that our intentions are sincere. The quarterly review of survey procedures would be performed at approximately the same time or day that other quarterly procedures are due, i.e. inventory sealed sources, dose calibrator linearity review, personnel dosimetry reports. The technologist has been instructed to notify the Radiation Safety Officer if results of surveys exceed the established trigger levels. The Radiation Safety Officer will respond in a timely manner and follow-up any incident in a report to me. Please consider changing the condition of survey review to a quarterly requirement for the radiation safety Officer, since trigger levels are a method of control and require RSO notification, quarterly reviews are more routine - minimizing human error, and quarterly reviews are acceptable according to the duties of the RSO listed in the ALARA Program.

C. An inventory of sealed sources has been conducted and will continue on a quarterly basis. The Radiation Safety Officer will review and initial the report each quarter. (see attached inventory).

D. A label has been placed on the Ludlum 14C survey meter noting exposure rate from a dedicated check source as determined at the time of calibration, and the date of calibration. The meter will be calibrated on an annual basis. Radiation Management Corporation will place the label on in the future. We will assure this is done when the meter is returned.

We feel that we have addressed the problems identified during the inspection and have achieved compliance as of this response date.

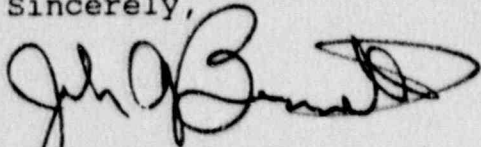
We will await your response to our request concerning change of Radiation Safety Officer, and frequency of survey review discussed above in B.2 and make further adjustments to maintain compliance.

Enclosures included in this response:

1. Amendment request to change RSO at Lawrence Park Imaging Center.
2. Memo regarding wipe test of final source container.
3. Inventory of sealed sources.

Please call me if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Bennett". The signature is fluid and cursive, with a large loop at the end.

John A. Bennett, M.D.
President

JAB/dms
Enclosures