

DETAILS

1. Persons Contacted

*William Lepaska, President, Hospital Financial Corporation
Frank Powell, Asst. Administrator, Physicians and Surgeons Hospital
Dana Davis, Physicians and Surgeons Hospital
Gary McNutt, Health Physicist, Missouri Bureau of Radiological Health
Robert Dever, M.D., Lucy Lee Hospital
Paul Erwin, Custodian, Poplar Bluff Hospital
Dennis Shaw, Former Employee, Poplar Bluff Hospital
Harold Galbraith, M.S., Consultant/Physicist, Hospital Financial Corporation

*Present at January 23, 1990, teleconference.

2. Inspection History

The last inspections of Licenses No. 24-06924-03 and 24-06924-04 were conducted on April 3, 1986, at which time three violations were identified. Two violations were identified against License No. 24-06924-03 (cobalt-60 teletherapy). These were (1) a failure to leak test the cobalt-60 teletherapy sealed source at six month intervals and (2) a failure to maintain the teletherapy control panel in the locked and "off" position. One violation was identified against License No. 24-06924-04 (nuclear medicine) involving a failure to conduct quarterly inventories of all sealed sources possessed.

All prior inspections of both licenses identified no violations.

3. Program Summaries

License No. 24-06924-03 was first issued on September 15, 1964, authorizing cobalt-60 teletherapy on humans. This was later amended to storage-only status at the licensee's request on July 23, 1980.

License No. 24-06924-04 was first issued on August 8, 1978, authorizing the use of strontium-90 for eye and skin treatments and cesium-137 for brachytherapy. In 1984, cobalt-60 wire was added to the possession list and the entire license was amended to storage-only status at the licensee's request. A license renewal in 1985 authorized use of Groups I, II, and III and storage-only for the other items.

License No. 24-06924-03 expires on April 30, 1990, and License No. 24-06924-04 expired on December 31, 1989. To date, no action for renewal of either license has been filed with Region III.

A review of the previous inspection report from the April 1986 inspection revealed that only brachytherapy and teletherapy procedures had been performed at Poplar Bluff Hospital. The report noted that no diagnostic or other therapy procedures were ever performed at the hospital. Moreover, all byproduct material possessed by Poplar Bluff Hospital, including the cobalt-60 teletherapy source, was placed into permanent storage in January 1984.

In July 1988, NRC Region III became aware that Poplar Bluff Hospital closed completely in February 1987, but failed to officially notify the NRC of their closure or the status of their radioactive material at that time. An investigation into the status of the Poplar Bluff program was then initiated by Region III.

Mr. Michael Turpin, who is specifically named on License No. 24-06924-03 as having direct supervision for the security of the stored radioactive material, was contacted in October 1988 after numerous unsuccessful attempts. Mr. Turpin was located at Physicians and Surgeons Hospital in Atlanta, Georgia. Mr. Turpin explained that Poplar Bluff, Physicians and Surgeons, and approximately nine other hospitals nationwide were owned and operated by Gateway Medical Systems of Atlanta, Georgia. After Poplar Bluff closed, Mr. Turpin left his position at Poplar Bluff as Director of Ancillary Services to fill his present position as Assistant Administrator at Physicians and Surgeons. He also explained that, to his knowledge, the radioactive material at Poplar Bluff was in safe storage and that the Poplar Bluff facilities were maintained by a custodian, Mr. Paul Erwin.

Mr. Erwin was contacted shortly thereafter. He informed Region III that the radioactive material was locked in storage within the locked teletherapy room and, to his knowledge, no one had been in that room since the hospital's closing in February 1987. Mr. Erwin also said that he had the only keys to the building and teletherapy room and that he entered the building almost daily for custodial purposes only (heating, security, etc.).

As a result of the discussions with Messrs. Turpin and Erwin, Region III requested the State of Missouri to followup on the Poplar Bluff matter. On November 2, 1988, Messrs. Turpin and Erwin met Mr. Gary McNutt of the Missouri Board of Radiological Health at Poplar Bluff Hospital. Mr. McNutt performed an inventory and leak test on all sealed sources, registered all radium sources with the state, and performed surveys of the area. Mr. McNutt's report (Attachment A) was received by Region III on November 7, 1988, and indicated that (1) all leak tests were negative; (2) security of the radioactive material appeared adequate; (3) Mr. Turpin was provided with a list of disposal options; and (4) Mr. Turpin was planning to dispose of the material as soon as possible.

On November 17, 1988, Region III received a letter from Mr. Turpin (Attachment B) that (1) indicated that Gateway Medical Systems would dispose of their radioactive material as soon as possible; (2) advised

that Ms. Donna McKinny, Legal Advisor, Gateway Medical Systems, was now the responsible individual for followup on the Poplar Bluff matter; and (3) provided a copy of the inventory conducted at the time in which the radioactive material was placed into storage.

As a followup, Region III attempted to contact Ms. McKinny on multiple occasions. Being unsuccessful, Mr. Turpin was contacted by phone on February 8, 1989 for an update. Mr. Turpin said that he thought Gateway was still awaiting an adequate bid from a disposal company, but he would followup to be certain. On March 13, 1989, Region III received a letter from Mr. Turpin (Attachment C) indicating that since Ms. McKinny could not be contacted, he would reactivate communication with Region III and, again, obtain bids from various disposal companies.

In December 1989, while attempting to contact Mr. Turpin and Ms. McKinney, it was learned that they were no longer with their respective companies. Mr. Turpin's position had been refilled and Ms. McKinny's position had been abolished.

Mr. Frank Powell, who replaced Mr. Turpin as Assistant Administrator at Physicians and Surgeons, was eventually contacted. He indicated that he was vaguely familiar with the matter but had not seen or heard anything regarding Poplar Bluff in quite some time. In addition, Mr. Powell was not clear as to who presently owned Poplar Bluff Hospital since, according to him, Gateway Medical Systems was bankrupt. He did agree, however, to look into the matter. Later conversations with Mr. Powell revealed that Poplar Bluff was repossessed in late 1989 by their financier, Hospital Financial Corporation of Twin Lakes, Wisconsin, which is headed by Mr. William Lepska.

Multiple attempts to contact Mr. Lepska were unsuccessful.

Meanwhile, Robert Dever, M.D., former Radiation Safety Officer at Poplar Bluff Hospital, was contacted at another local hospital in Poplar Bluff, Missouri. Dr. Dever, however, was not clear as to the status of the radioactive material.

In addition, Mr. Erwin, the aforementioned custodian, was contacted and questioned about the matter. Mr. Erwin indicated that the room was still locked and secure and he said that, to his knowledge, no one had been in the room, including himself, since the State of Missouri did their inquiry at the request of Region III in November 1988.

On January 8, 1990, Mr. Lepska was finally contacted. Mr. Lepska said that he was aware of the radioactive material's existence at Poplar Bluff, but knew nothing of its present status. He divulged his tentative plans for the property, which included selling the hospital building to the county in which Poplar Bluff is located. At that time, Region III requested from Mr. Lepska a letter that would (1) describe the circumstances leading to Hospital Financial Corporation's (HFC)

acquisition of the hospital, (2) state who the legal owner/responsible party of the radioactive material was, and (3) outline the tentative plans for the facility as a whole.

On January 16, 1990, Region III received a letter from Mr. Lepaska (Attachment D) which explained that HFC initially purchased Poplar Bluff Hospital in 1974 and leased it to a hospital management company. In 1984, it was sold to a hospital management company called Gateway Medical Systems. The sell in 1984 was financed by HFC. HFC repossessed the hospital and all of its contents, including the radioactive material, in October 1989 because Gateway defaulted on its mortgage. 10 CFR 30.3 requires that no person shall manufacture, produce, transfer, receive, acquire, own, possess, or use byproduct material except as authorized in a specific or general license issued pursuant to the regulations in Part 30. Mr. Lepaska nor his company, HFC, hold any type of specific or general license that authorizes possession of the byproduct material stored at Poplar Bluff Hospital (see Attachment B for a listing of all radioactive materials currently stored at the Poplar Bluff Hospital). This unauthorized acquisition and possession of byproduct material constitutes a violation of 10 CFR 30.3.

Mr. Lepaska also expressed in his letter that as owner and president of HFC, Poplar Bluff Hospital and, therefore, the radioactive material stored therein was owned by him and he would accept responsibility for the material. With regard to the radioactive material, Mr. Lepaska indicated his intention of disposing of the material and that the manufacturers would be contacted initially for guidance in the disposal process. Finally, Mr. Lepaska said that he was planning to sell the properties to the City of Poplar Bluff and the County of Butler as soon as all the details were finalized, including the proper disposal of all radioactive material possessed.

One apparent violation of NRC requirements was identified.

4. January 16, 1990 Inspection Summary

The custodian, Mr. Erwin, was contacted by the Region III inspector on January 9, 1990, to make arrangements for an inspection of Poplar Bluff Hospital on January 16, 1990.

Upon entering the locked building, on January 16, 1990, to which only Mr. Erwin has a key, the inspector and Mr. Erwin proceeded to the teletherapy room. Upon opening the locked and posted teletherapy room, the inspector observed an AECL Theratron Junior cobalt-60 teletherapy unit within which the cobalt-60 teletherapy sealed source was presumably stored. The unit appeared to be in satisfactory condition and the control panel for the unit appeared to be locked in the "off" position with the electrical power to the unit disconnected.

The inspector also observed a large wooden box presumably containing all of the other radioactive material. The box itself was locked, but it was not posted in any way.

Radiation surveys of the room, the teletherapy unit, and the storage box were conducted using (1) an Eberline PRM-6 radiation detector (NRC #007305, last calibrated November 16, 1989); (2) a Ludlum 14C G-M thin-end window survey meter (NRC No. 013164, last calibrated November 28, 1989); and (3) Xetex 305B survey meter (NRC No. 013167, last calibrated January 9, 1990).

The survey results were as follows:

Area	Instrument		
	Eberline	Ludlum	Xetex
Background (outside room)	150 cpm	0.04 mr/hr	0.1 mr/hr
Teletherapy head surface (avg)	25000 cpm	5.0 mr/hr	6.0 mr/hr
surface (max)	40000 cpm	10.0 mr/hr	12.0 mr/hr
Storage box surface (avg)	15000 cpm	2.5 mr/hr	3.0 mr/hr
surface (max)	100000 cpm	25.0 mr/hr	28.0 mr/hr

Wipe tests of the floor, the wooden storage box, and the teletherapy head were conducted and analyzed onsite using the aforementioned instruments. No gross contamination was discovered.

Since, according to Mr. Erwin, no one had accessed the room since November 1988, and the condition of the radioactive material was unknown, an inventory of the material was not performed by the inspector for radiation safety reasons (i.e. potentially leaking sealed sources). However, it is believed that the radiation levels presented above suggest that all of the radioactive material listed in the 1984 inventory was present (see Attachment B). Also, the teletherapy head plate denotes the source within as 495 curies of cobalt-60 as of August 5, 1970. As of January 1990, the source activity has been calculated to be approximately 39 curies.

Upon completion of the inspection, the teletherapy room was relocked by Mr. Erwin. The inspector surveyed the feet of both Mr. Erwin and himself. No gross contamination was found and Mr. Erwin and the inspector exited and relocked the building.

Laboratory analysis of the wipe samples performed later at Region III also revealed no removable contamination.

5. Exit Interview

On January 23, 1990, an exit interview was held via telephone with Mr. Lepeska. After the issues were discussed, Mr. Lepeska agreed to commit to the following:

1. All byproduct material would be divested within 30 days and in the interim the material will remain stored as it currently is with the building continuing to be locked and secured;
2. Security of the storage area would continue to be maintained in the interim until fully divested and weekly checks would be performed to check the security status of the material;
3. A leak test of the cobalt-60 teletherapy source would be performed within 10 days and the sealed source storage locker would be posted with appropriate caution labels;
4. The divestiture of all byproduct material would be coordinated through an NRC-approved consultant and Mr. Erwin; and
5. Electrical power supply will remain disconnected from the teletherapy unit.

Region III followed up the commitments in the form of a Confirmatory Action Letter issued to Hospital Financial Corporation on January 24, 1990. On February 14, 1990, the Region was notified by the licensee's consultant (Mr. Galbraith) that the teletherapy unit's cobalt-60 source had been leak tested and the storage locker was posted with caution labels (results of these leak tests were negative). The remaining commitments still are considered to be open issues pending the successful completion of each of them. Closure of these items will be forwarded to the licensee by separate correspondence.

Attachments:

- A. Report from Mr. G. McNutt of the Missouri Department of Health dated November 4, 1988.
- B. Letter from Mr. M. Turpin of Physicians and Surgeons Hospital dated November 8, 1988, including Poplar Bluff inventory
- C. Letter from Mr. M. Turpin of Physicians and Surgeons Hospital dated March 8, 1989
- D. Letter from Mr. W. Lepeska of Hospital Financial Corporation dated January 11, 1990.



Missouri Department of

HEALTH

ATTACHMENT A

John Ashcroft
Governor

Robert Harmon, M.D.
Director

P.O. Box 570, Jefferson City, MO 65102 • 314 / 751-6400

November 4, 1988

Mr. Stanley Lasuk
US NRC, Region 3
799 Roosevelt Road
Glen Ellyn, IL 60317

Dear Mr. Lasuk:

Enclosed is a copy of the survey which I conducted at Poplar Bluff Hospital in Poplar Bluff, Missouri. If you need additional information or have questions regarding the survey, please feel free to contact me.

Sincerely,

Gary W. McNutt
Radiological Health Analyst
Bureau of Radiological Health

smk

Enclosure

cc: Mr. Mike Turpin

NOV 7 1988

Date of Survey: November 2, 1988

Location: Poplar Bluff Hospital
215 Oak Street
Poplar Bluff, MO 63901
(314) 785-7701

Surveyor: Gary W. McNutt
Radiological Health Analyst
Missouri Department of Health
Bureau of Radiological Health
P. O. Box 570
Jefferson City, MO 65102
(314) 751-6083

Others: Mike Turpin
Gateway Medical Systems, Inc.
Physicians & Surgeons Hospital
2355 Bolton Road, N.W.
Atlanta, GA 30318
(404) 352-1200

Paul Erwin
Poplar Bluff Hospital

Survey Instruments: Ludlum Model 14C GM
Portable Survey Meter
Calibrated 9-8-88

Eberline PAC 4S Alpha
Portable survey meter
Calibrated 9-12-88

Equipment Surveyed: Picker Theratron Co 60
Teletherapy Unit
Source- 495 Ci, 8-5-70
Maximum external readings:
Model 44-7 probe - 12 mR/hr
Model 44-6 probe - 10 mR/hr

Wipe test of the port and surface
area of the teletherapy head
indicated no removable contamination.

Radioactive Material: Material is stored in containers which
are locked inside a large wooden box.
Last survey of the material and containers
was performed by A. Emmons, Consultant,
on 1/13/84. Dr. Emmons had labeled items
as either contaminated or clean.

One small box contained Co 60 and Cs 137. A wipe of the outside of the container indicated no removable contamination.

One box contained a Sr 90 source with eye applicator. A wipe of the outside of the container indicated no removable contamination.

One box was empty but was labeled by Dr. Emmons as being contaminated on the inside. A wipe of the surface indicated no removable contamination.

One large lead container held two 5 mgm Radium needles. The needles and the inside & outside of the container were wiped and indicated no removable contamination. The needles were surveyed with both the GM and Alpha survey meters. Readings of greater than 2 R/hr were noted close to the surface of the needles.

Other Notes:

The door leading into the room which contained the teletherapy unit and the radioactive material was locked and posted.

All outside doors to the building were locked.

The wooden box set behind a mobile x-ray shield. Maximum reading around the box was approximately 20 mR/hr.

Stanley Lasuk, US NRC, Region 3, 799 Roosevelt Road, Glen Ellyn, Illinois 60137, was contacted by Gary McNutt and the results of the survey was relayed to Mr. Lasuk. Mr. Lasuk expressed satisfaction with the survey and asked that a written report be sent to him.

< Mr. Turpin indicated that his company would be disposing of the material as soon as possible. A list of commercial disposal companies was left with him.

The radium was registered with the state.

Physicians And Surgeons Hospital ATTACHMENT B

Mr. Stanly Lasuk
USNC Region III
779 Roosevelt Road.
Glen Ellyn, Illinois 60137

Date: November 8, 1988

Dear Mr. Lasuk:

This will acknowledge our phone call of November 4, 1988 regarding the situation at the Poplar Bluff Hospital, Poplar Bluff, Mo. I enclose a copy of a summary table of the "holdings" of radioactive materials and marked ITEM 3. This summary table was prepared by A.H. Emmons, PhD on February 4th, 1984. All of the material was placed inside of a lead line box and locked except for the source in the Theratron Jr. The materials remain in the same position as of November 2, 1988 at which time I met Mr. Gary McNutt from the Bureau of Radiological Health of the State of Mo. at the Poplar Bluff Hospital. Mr. Paul Erwin, who is the custodian of the hospital building since its closing in early 1987, let us into the locked facility and then into the locked radiology room which also has leaded walls and doors. Mr. McNutt performed a current evaluation of the status of all of the listed materials on the summary table, and performed a leak test on the Theratron Jr. which apparently revealed no leakage at this time. All of the materials were found to be in safe condition. Mr. McNutt said that he would be giving you a call and sending me a report regarding his findings which I am waiting to

2355 Bolton Road, N.W., Atlanta, Georgia 30381-1501
Phone 404-352-1200

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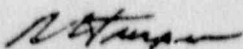
receive. Mr. McNutt filled out the proper form for the Radium Needles that comes under the State of Mo. and then we both witnessed the locking of the lead box and the leaded door and we departed.

Pursuant to your request the name, title, address and phone number of the contact person who will be ultimately responsible for closing this matter is Ms. Donna McKinny, Legal Advisor, Gateway Medical Systems 2355 Bolton Road, N.W. Suite #2 Atlanta, GA. 30381 phone 404-351-9611.

I am enclosing copies of brokers for radiation waste and waste disposal sites, that I will be contacting. Enclosed is a copy of the letter and a listing of names and addresses of broker's. I anticipate a response in the next two to three weeks at which time I will give you a update and a plan of disposal.

If you have any further questions or need additional assistance, please don't hesitate to call me.

Sincerely,



Michael D. Turpin
Asst. Administrator
Ph. 404-352-1200 ext. 380

CC: ~~404-352-1200 Gary McNutt~~

~~Regional Materials Licensing Section~~

~~Donna McKinny~~

Enclosure

POPLAR BLUFF HOSPITAL
RADIOACTIVE SOURCE INVENTORY
January 13th, 1984

RADIUM

Two (2) needles of 5 mgm each. Each about 3 cm length.

CESIUM

Five (5) needles of total activity of 150 mCi Cs-137

COBALT-60

Eleven (11) wires (needles) and an assortment of "cut" lengths of (what appears to be) a Cobium alloy of Cobalt used in implant therapy. The total activity of these assorted sources is 22 mCi.

One (1) source contained in the head of a THERATRON, JR teletherapy unit. This source is calculated to be 84 Curies on January 17th, 1984. (The original loading was 495 Curies on August 5, 1970.)

STRONTIUM

One (1) strontium applicator of 55 mCi in March of 1964.

In the box with the strontium applicator there are three (3) 25 uCi Tracerlab sources used for instrument checks. These are Ra-226 sources. There is also one (1) instrument check source of unknown origin and isotope in the same box. This is a Beta source used in days gone by to determine if a Geiger instrument was functional.

Physicians And Surgeons Hospital

March 8, 1989

Mr. Stanly Lasuk
USNG Region III
779 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Lasuk:

This is an update of the proceedings regarding the radioactive materials at the Poplar Bluff Hospital. I was surprised to hear that you haven't been able to contact Donna McKinny, (404) 351-9611, Gateway Medical Systems, Corporate Office, who has been designated the responsibility of all communications regarding this matter. Because of the lack of communications between the NRC and Ms. McKinny, I will reactivate communications, requesting price quotes on the removal of the source materials.

Effective today, we will resubmit a request to the following companies in the hopes that we can resolve this matter. This information is also being forwarded to Ms. McKinny and a plan of disposal should be forthcoming from the office of Ms. McKinny.

ADCO Services, Inc.
P. O. Box 35
Tinley Park, ILL 60477
(312) 429-1660

Economy Forms, Inc.
4301 NE 14th St.
Des Moines, Iowa 50316
Ralph Jennings
(515) 266-1141
1-800-247-2432

Halliburton Services
Drawer 1431
Dunklin, OK 73536
Hohn Gatewood
(405) 251-3577

Harza Engineering
150 So. Wacker Drive
Chicago, ILL 60606
R. B. Russell
(312) 855-7000

Nuclear Sources and Services, Inc.
P. O. Box 34042
Houston, Texas 77034
R. J. Gallagher
(713) 641-0391

Rad Services, Inc.
500 Penn Center
Pittsburg, Penn. 15235
Stan Tollison
(412) 823-0810

WASTE DISPOSAL SITES

South Carolina:

Chem-Nuclear Systems, Inc.
One Greystone West
240 Stone Ridge Dr
Columbia, SC 29210
Glen A. Pae (803) 256-0450

Nevada & Washington:

U.S. Ecology, Inc.
9200 Chelhyville Rd./Ste 526
Louisville, KY 40222
Arvil Crase (502) 426-7160

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Mr. Stanly Lasuk
Page Two

If your office has additional disposal companies which do not appear on our list, please call Donna or mail her the information so that she can act on this immediately.

Thank you.

Sincerely,



Mike Turpin
Assistant Administrator

MDT:sg

CC: Gary McNutt
Donna McKinry
Patty Whiston

**HOSPITAL FINANCIAL
CORPORATION**

1539 Lake Shore Drive
Twin Lakes, Wisconsin 53181
414-877-3631
Fax: 414-877-3739

January 11, 1990

Mr. Bruce Mallett
Nuclear Regulatory Commission
Branch Chief Licensing & Inspection
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Mallett,

I am writing this letter to you at the suggestion of Brian Parker of your Division of Licensing & Inspection. He suggested that I give you this background information regarding the present status of Poplar Bluff Hospital in Poplar Bluff, Missouri, and the nuclear material presently being stored in that hospital.

Hospital Financial Corporation purchased Poplar Bluff Hospital in 1974 and has since then leased the hospital to a hospital management company and more recently sold the hospital to a management company. The more recent transaction - the sale of the facility, was to Gateway Medical Systems in 1984. Since then Gateway Medical Systems has defaulted in its mortgage payments and title to the hospital has passed back to Hospital Financial Corporation. Hospital Financial Corporation repossessed the hospital in a sheriff's auction in October of 1989.

This letter is being written specifically regarding License No. 24-06924-03 covering the use of a Cobalt 60 source with a teletherapy system. Presently this system is under a "storage only" license which expires April 31, 1990. We will attempt to sell this equipment before the expiration of the above referenced license. We plan to leak-test the source in the near future using local authorized testing agents. Certainly a leak-test will be performed before this system is moved. We do intend to talk to AECL of Canada to get their advice regarding the possible return of the system, or their suggestion for a new home for the equipment, along with the source.

I am also writing in reference to License No. 2406924-04 which covers several sources that were being used under a Nuclear Medicine License. These sources do not at the present time

JAN 16 1990

Mr. Bruce Mallett
Nuclear Regulatory Commission

January 11, 1990
Page 2.

require a wipe test since they are in satisfactory storage, however we will check with your office before we attempt to move or dispose of these sources. The license covering this nuclear medicine activity expired December 31, 1989, so that we will be in touch with your office as soon as we decide what needs to be done to dispose of these sources.

I am president and owner of Hospital Financial Corporation, therefore I represent Hospital Financial Corporation and its responsibility in properly handling this radioactive material. All correspondence from your office regarding the radioactivity at this hospital facility should be directed to me at the address indicated on this letterhead.

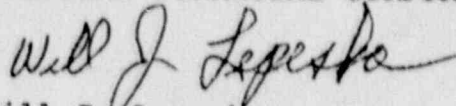
At Brian Parker's suggestion, I plan to talk to the various manufacturers of the radioactive material, i.e. 3M Company, Abbott Labs, Tracer Lab and AECL. I will also be talking to a Gary McNutt of the Missouri State Licensing Authority regarding his license coverage of two radium needles that are also stored at the hospital.

I am now in the midst of early discussions with potential buyers of the hospital facility. At the present time it appears that the City of Poplar Bluff is interested in purchasing the clinic building for use for library expansion, and the County of Butler, Missouri, is interested in acquiring the hospital for housing several different county programs.

I plan to stay in close contact with Brian Parker regarding this situation and am receptive to any suggestions your office might want to make as to how we can resolve this problem of storage of unused radioactive material.

Sincerely,

HOSPITAL FINANCIAL CORPORATION



Will J. Lepaske
President

WJL/j

cc: Mr. Brian Parker
Nuclear Regulatory Commission
Division of Licensing & Inspection