

DONALSON X-RAY ASSOCIATES, P.C.

BRINTON C. DONALSON, D.O.

609 E. JOLLY RD.

LANSING, MICHIGAN 48910

PHONE: (517) 393-6150

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

RE: Brinton C. Donalson, D.O. --- License No. 21-15508-01

Dear Sirs:

This is in answer to your letter dated May 4, 1981, in regard to the routine safety inspection, by Ms. E. Matson, on February 24, 1981, the telephone discussion of March 4, 1981, the enforcement conference on March 18, 1981, my initial letter of reply, which was received by your office on April 6, 1981 and our current activities.

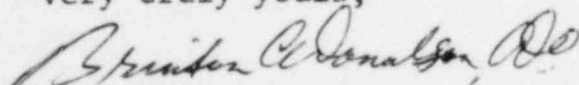
The specific areas of question are answered in Appendix A, attached. I would also call your attention to my previous letter to you, which was received April 6, 1981, and has been assigned Docket No. 030-09240, or Control No. 04682.

It is my feeling that we are currently in compliance with the items which have been brought to my attention. However, I can only hope that the features of these requirements that are out of my hands, such as the social security numbers, birth dates and sex of the individuals on our radiation exposure records, which are obviously prepared by an outside company and whose preparation is somewhat beyond our control, but are certainly a matter of record and most easily substantiated, would be recognized as hardly qualifying as a lack of management control.

During the enforcement conference, on March 18, 1981, I found the advice and concern of both Mr. Skowronek and Dr. Cooper helpful and encouraging. I remained frightened, however, at the magnitude of the civil penalties discussed and it becomes apparent that if the magnitude of the penalties for a private practitioner are the same as those of a giant corporation, then my margin for survival is extremely limited.

An item by item response to your Appendix A follows.

Very truly yours,



Brinton C. Donalson, D.O.
License No. 21-15508-01

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DONALSON X-RAY ASSOCIATES, P.C.

BRINTON C. DONALSON, D.O.

609 E. JOLLY RD.

LANSING, MICHIGAN 48910

PHONE (517) 393-6156

May 22, 1981

APPENDIX A

Brinton C. Donalson, D.O.

License No. 21-15508-01

1. Item (1) refers to a whole body radiation of 2.120 rems during the third quarter of 1980. This was referred to the Landauer Film Badge Service who report that the re-inspection of the badge in question confirms the single exposure of 2.080 rems of Gamma or X-radiation shows no movement which would imply a single exposure. Our records indicate that the subject in question was on a ten day vacation during the exposure period of 7-15-80 to 8-14-80, at which time the lab coat, containing the film badge, was left in the deck of the subjects car, in direct sunlight, for the entire 10 day period. We do not feel that this represents a nuclear or radiographic exposure and discussion with Mr. Skowronek at the enforcement conference further confirms my impression that the exposure occurred to the film badge, rather than to the subject, and at off-duty hours outside of this facility.

Please refer also to Docket No. 030-09240 or Control No. 04682.

2. Item (2) refers to the failure to submit a report to the Commission concerning this excessive film badge reading.

This was my first experience with an excessive film badge reading and hopefully my last. A belated report was submitted in the aforementioned Docket, described under section number (1), and my failure to recognize the high reading was apparently due to my assumption that this was a cumulative dose, rather than a dose for the month in question. Having been through this experience I doubt very seriously that I will fail to recognize the differences in the future. However, both the Technicians and myself are currently reviewing the monthly reports, which should further reduce any opportunity to overlook an abnormal reading. In addition, I contacted Landauer and requested an asterisk or notification when any reports fall outside the accepted levels.

3. Item (3) alluded to the coverage of my office by a licensed physician, whose license was listed separately, rather than on mine.

My license has since been amended to include the covering physician at such times as those in question.

(Continued)

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APPENDIX A Continued

Page II

4. Item (4) refers to the G-M surveys and wipe tests, conducted weekly.

As noted, during my enforcement conference, since I no longer use a generator and am using unit dosages, it was my misunderstanding that these were no longer necessary. The G-M surveys and wipe tests are being done at this time and are being recorded as per the requirements of the licensure. This does seem an exercise in frustration, in that we are using unit doses and have a single Technician, so that any question of a spill is certainly obvious and the surveys and wipe tests amount to a mere recording of background, BUT THIS IS BEING DONE.

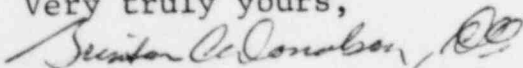
5. Item (5) refers to the quarterly linearity test.

It was my impression that going from a generator to unit doses obviated the need for a linearity test. I must admit I was not familiar with the technique for grafting the test of linearity and have asked my consulting physicist to indeed show us the proper graft paper for grafting the results of the linearity test. His next visit is scheduled for June 9th. The first test has been done and awaits only the utilization of the proper graft paper, at which time we will be in full compliance on this requirement. I can see from the visual results of the linearity test that the dose calibrator meets the requirements for linearity.

6. Item (6) refers to the sensitive area of social security numbers, birth dates and sex of the individuals on the exposure records. I feel that these are items somewhat beyond my control. The proper information has been sent to Landauer and is certainly available here in this office at any time that you request it, but I do not feel that this is a fair item for utilization in the notice of violation. The information has been forwarded to Landauer and it is my hope that they will comply. My only alternative would be to have my own secretary fill these items in as the reports are sent to us, which it would seem should suffice.

With the exception of the grafting of the results of the linearity test and the typing in of the social security numbers, birth dates and sex of the individuals on my radiation exposure reports, I am currently in compliance with the items listed. My next inspection from the consulting physicist is scheduled for June 9th, at which time I should be in full compliance.

Very truly yours,



Brinton C. Donalson, D.O.

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