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June 12, 1981

Mr. James H. Joyner, Chief
Technical Inspection Branch
Division of Engineering and Technical Inspection
United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Joyner:

Subject: Inspection 81-01
NRC License: 20-15835-01
Docket No.: 30-9870

With reference to our inspection and items which were not in full compliance:

- A. Item 1 - Items 10.2 and 10.3 of application require that we perform daily constancy checks on the dose calibrator with Co-57 and Cs-137 check sources.

Effective immediately, we will perform and record constancy checks with the dose calibrator with Co-57 and Cs-137 check sources.

Item 2 - Item 10.4 of the application requires that activity linearity test results be performed on our dose calibrator be within $\pm 5\%$.

Since our NRC inspection, we have purchased a new Capintec CRC-17 dose calibrator. Effective immediately, we will perform linearity tests semi-annually and will record the results. Errors greater than $\pm 5\%$ will indicate need for repair or adjustment to the instrument. In the event that repairs are necessary, they will be made by an approved commercial company.

Item 3 - Item 15.3 of application requires use of syringe shields for preparation of patient doses and administration of radiopharmaceuticals to patients.

Effective immediately, we will use syringe shields for preparation of patient doses and administration of radiopharmaceuticals to patients.

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Item 4 - Item 17.D of application requires we perform series of wipe tests in all areas where radioactive materials are used.

Effective immediately, we will count our wipe tests in a well and spectrometer used for our wet work that is sensitive enough to detect 100 disintegrations per minute of removable contamination.

- B. Item 1 - 10 CFR 20.201 (b) requires we make surveys as may be necessary for us to comply with all sections of Part 20.

Effective immediately, we will strictly adhere to the following procedure for waste disposal.

At the end of each decay period, we will use an open end window GM tube, and it must read less than 200 cpm to be considered not radioactive. At that time all radioactive markers will be removed or obliterated. Prior to monitoring the material each category will be as follows:

1. Short half-life waste - hold at least one week, monitor and dispose.
2. Medium half-life waste - hold at least three months, monitor and dispose.
3. Long half-life waste - must decay at least ten half-lives, monitor and dispose if under 200 cpm.

The following audit procedure will be used to insure safe disposal of low-level radioactive waste. Records of disposals will be kept. At least four times a year, the RSO or designate will audit activities and amounts of waste to insure we are in full compliance with the NRC. These records will be maintained in our radioactive log and shipment transfer book.

To improve our radiation safety program, quarterly audits will be done by our consultant to assure compliance with the NRC's regulations and conditions of our license.

If you should have any questions, please do not hesitate to call.

Sincerely yours,

Thomas J. Lapine
Thomas J. Lapine, M.D.

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