

2129 S.W. 59th Street
Oklahoma City, OK 73119
(405) 685-6671

27 FEBRUARY, 1990

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

LICENSE #: 35-13435-01
DOCKET #: 030-02927/89-01

GENTLEMEN:

THIS LETTER IS IN RESPONSE TO YOUR FEBRUARY 2, 1990 LETTER REFERRING TO THE ROUTINE SAFETY INSPECTIONS OF OCTOBER 30, 1989 AND JANUARY 5, 1990. DURING THOSE INSPECTIONS YOU FOUND SEVERAL VIOLATIONS. WE WILL RESPOND TO THOSE VIOLATIONS AS NOTED IN APPENDIX A OF THE AFORE MENTIONED LETTER.

- A. YOUR INSPECTORS NOTE THAT DURING 1986, 1987, 1988 AND 1989 THAT THE RADIATION SAFETY COMMITTEE HAD NOT MET AT LEAST QUARTERLY. THIS WAS A ADMINISTRATIVE OVERSIGHT AND HAS NOW BEEN PLACED ON A SCHEDULE WHICH CALLS FOR A FEBRUARY, MAY, AUGUST, AND NOVEMBER QUARTERLY MEETINGS OF THE RADIATION SAFETY COMMITTEE. THE ANNUAL REVIEW IS HELD IN CONJUNCTION WITH THE NOVEMBER MEETING. OUR LAST ANNUAL REVIEW WAS ON NOVEMBER 30, 1989 AND OUR LATEST QUARTERLY MEETING IS ON FEBRUARY 27, 1990.
- B. A LOCK WAS INSTALLED ON THE NUCLEAR MEDICINE DOOR IN NOVEMBER IMMEDIATELY AFTER THE OCTOBER 30, 1989 NRC VISIT. WE HAVE ALSO INSTRUCTED THE TECHNOLOGISTS TO KEEP THE NUCLEAR MEDICINE DOOR LOCKED WHEN SHE IS NOT PHYSICALLY PRESENT. THIS IS BEING CHECKED ON BY THE RADIATION SAFETY OFFICER THE DEPARTMENT DIRECTOR AND THE CONSULTING PHYSICIST.

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- C. THE NUCLEAR MEDICINE DEPARTMENT WAS MOVED BETWEEN THE TIME OF THE LAST INSPECTION AND THE CURRENT INSPECTION. OUR CONSULTING PHYSICIST HAD ADVISED US THAT WE DID NOT NEED TO HAVE A LICENSE AMENDMENT UPON RELOCATING THIS AREA. WE NOW KNOW THAT THIS IS TO THE CONTRARY OF ANY FUTURE MOVES OF WHERE RADIO-ACTIVE MATERIAL USED OR HOUSED WILL RESULT IN APPLYING FOR A LICENSE AMENDMENT.
- D. A RADIO-ACTIVE MATERIALS SIGN WAS ADDED TO THE DOOR OF THE NUCLEAR MEDICINE THE DAY AFTER THE INSPECTION BY THE NUCLEAR REGULATORY COMMISSION, THIS WAS AN OVERSIGHT ON OUR PART.
- E. FOR ITEM 1A., 1B. AND 1C ALL PERTAINING TO DOSE CALIBRATOR QUARTERLY AND ANNUAL TESTS NOT BEING DONE DURING THE PAST 2 TO 3 YEAR INTERVAL AT THE APPOINTED TIMES. WE HAD RELIED ON OUR CONSULTING PHYSICISTS TO PERFORM THESE TESTS WHICH APPARENTLY HAD NOT BEEN DONE OR AT LEAST NO RECORDS OF THOSE TWO YEARS. IN ANY EVENT WE HAVE HIRED A NEW CONSULTING GROUP TO ASSIST US WITH THESE TESTS. THESE TESTS NOW ARE ALL COMPLETE AS OF OCTOBER 31, 1989. THESE NOW ARE EVALUATED ON A QUARTERLY BASIS WITH THE PHYSICIST REPORT AND REVIEWED BY THE RADIATION SAFETY OFFICER. THE PHYSICS REPORT WILL ALSO BE REVIEWED AT THE SAFETY COMMITTEE MEETING.
- E2. OUR CONSULTANTS HAVE EVALUATED OUR NEW LUDLUM GM SURVEY METER WITH A THIN WINDOW ON FEBRUARY 15, 1990 TO ENSURE THAT IT WILL DETECT 200 dpm ON WIPES. WE WILL MAINTAIN A COPY OF THAT REPORT FOR NRC INSPECTION.
- E2 B. WE HAVE UPDATED OUR DAILY SURVEY AND WEEKLY WIPE RECORDS TO INCLUDE A DRAWING OF THE AREA SURVEYED AND WIPED. THIS WAS DONE IN NOVEMBER 1989. THE PERTINENT COUNTING EFFICIENCIES OF THE WIPE DETECTION EQUIPMENT WAS DONE ON FEBRUARY 15, 1990.

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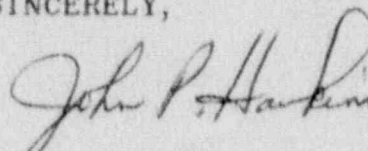
THE HOSPITAL INTENDS TO MAKE EVERY EFFORT TO COMPLY WITH ALL REGULATIONS AND HAVE MORE OVERSIGHT OF THE PROGRAM THROUGH THE RADIATION SAFETY COMMITTEE MEETINGS. WE HAVE ASKED OUR CONSULTING PHYSICIST TO INCLUDE WITH THEIR REPORTS AN AUDIT OF THE STATUS VIOLATIONS THAT YOU IDENTIFIED AND SUBMIT THEM TO US QUARTERLY.

WE ALSO WILL BE CHECKING ON THE STATUS OF THESE VIOLATIONS THROUGH THE RADIATION SAFETY OFFICER AND THE DEPARTMENT DIRECTOR. WE BELIEVE AT THIS TIME THAT ALL ITEMS THAT WERE IDENTIFIED IN YOUR LETTER HAVE BEEN CORRECTED. IF YOU OR YOUR STAFF HAVE QUESTIONS CONCERNING OUR RESPONSE, PLEASE DO NOT HESITATE TO ALL.

* IN JANUARY 1990, THE HOSPITAL NAMED JOHN HAWKINS AS THE NEW EXECUTIVE VICE PRESIDENT TO REPLACE WANDA LEWELLEN.

* THE HOSPITAL REQUESTS LICENSE AMENDMENT CHANGING THE RADIATION SAFETY OFFICER FROM T.H. MOLSKNESS, D.O. TO C.T. WOOLARD, D.O.

SINCERELY,



JOHN P. HAWKINS
EXECUTIVE VICE PRESIDENT

JPH/frm