

MAR 28 1990

In Reply Refer To:
License: 30-01747-02
Docket: 030-02583/90-01

Veterans Administration Medical Center
Nuclear Medicine Section (115)
2100 Ridgecrest Drive, S.E.
Albuquerque, New Mexico 87108

Gentlemen:

Thank you for your letter of March 13, 1990, in response to our letter and attached Notice of Violation both dated February 23, 1990. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine whether full compliance has been achieved and will be maintained.

Sincerely,
Original Signed By:
LAWRENCE A. YANDELL

for
A. Bill Beach, Director
Division of Radiation Safety
and Safeguards

cc:
New Mexico Radiation Control Program Director

bcc w/copy of licensee letter:
DMB - Original (IE-07)
RDMartin
ABBeach
LAYandell
MRodriguez, OC/LFDCB (MS 4503)
CLCain
WLFisher
GMVasquez
NMIS
MIS System
RIV Files (2)
RSTS Operator

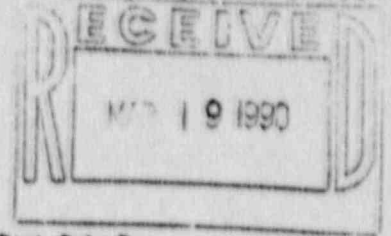
RIV:NMIS *mm*
GMVasquez:ch
03/24/90

C:NMIS *ole*
CLCain
3/26/90

AD:DRSS
ABBeach *key*
3/27/90 *for*

9004040044 900328
REG4 LIC30
30-01747-02 PDC

IE-07
111

**Veterans
Administration**

In Reply Refer To:

March 13, 1990

Mr. A. Bill Beach, Director
 Division of Radiation Safety & Safeguards
 U S Nuclear Regulatory Commission, Region IV
 611 Ryan Plaza Drive, Ste 1000
 Arlington, Texas 76011

Re: License 30-02747-02 Docket 030-02583/90-01

Dear Mr. Beach:

This is in response to your letter of February 23, 1990, regarding the routine unannounced radiation safety inspection conducted by Mr. G. Michael Vasquez of your office on January 16, 1990.

In regard to the violations noted in your letter appendix, we have the following responses.

Item #1

a. We considered our patient population to consist of patients who had veins that were difficult to access and hence did not use syringe shields.

b. We have purchased 10 syringe shields.

c. We have instructed all nuclear medicine personnel to use the syringe shields unless contra-indicated by the attending physician.

d. Full compliance will be achieved as soon as the syringe shields are delivered. We anticipate this to be on or before April 1, 1990.

Item #2

a. The required surveys were not conducted because the health physics technician was on vacation and no-one else realized the surveys would not be performed due to a lack of communication.

b. We have administratively added a back-up contamination survey technician to ensure that all surveys are performed weekly.

903290133 JAP.

"America is #1—Thanks to our Veterans"

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IC-90-094

Mr. A. Bill Beach, Director
Division of Radiation Safety & Safeguards
US Nuclear Regulation Commission, Region IV
March 13, 1990
Page 2

c. The Chief Nuclear Medicine Technician will monitor the survey log to ensure that surveys are performed on a weekly basis.

d. These actions have been instituted as of March 1, 1990.

Item #3

a. The technicians were logging the dose calibrator response measurements in a log book and evaluating the response relative to previous readings.

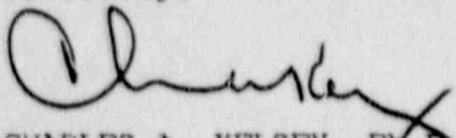
b. We have instituted the practice of plotting the dose calibrator response on a daily basis.

c. The Chief Technician will review this plot weekly.

d. These practices have been instituted as of March 1, 1990.

If you have any questions regarding our response, please do not hesitate to contact me.

Sincerely,



CHARLES A. KELSEY, Ph.D.
Radiation Safety Officer

Attachment

cc: Woodrow Burch, COS (11)
Brian Eisenberg, MD, Nuclear Medicine (115)
Benito Garcia, State Radiation Control Program
Michael F. Hartshorne, MD, Chief, Radiology Service (114)
Andrew Meholic, MD, Radiation Service (114)
James Brooks, Industrial Hygenist, Engineering (138)
Melvin Hale, Nursing Service (118)



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

FEB 23 1990

In Reply Refer To:
License: 30-01747-02
Docket: 030-02583/90-01

90 MAR -7 AM 10:12

RECEIVED IN RADIOLOGY DIV
MAR 21 09 44 AM '90

Veterans Administration Medical Center
Nuclear Medicine Section (115)
2100 Ridgecrest Drive, S.E.
Albuquerque, New Mexico 87108

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Mr. G. Michael Vasquez of this office on January 16, 1990, of the activities authorized by NRC Byproduct Material License 30-01747-02, and to the discussion of our findings held by the inspector with members of your staff at the conclusion of the inspection.

The inspection was an examination of the activities conducted under the license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of the license. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, independent measurements, and observations by the inspector.

During this inspection, certain of your activities were found not to be conducted in full compliance with NRC requirements. Consequently, you are required to respond to this matter in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation enclosed with this letter.

The inspector noted that your radiation protection program appeared greatly improved since our inspection on June 20-21, 1988, where several violations were identified. In general, record keeping appeared adequate despite Violations 2 and 3 listed in the attached Notice of Violation. The inspector also reviewed the actions you had taken with respect to the violations observed during the immediately previous inspection conducted on March 9, 1989. He verified that the corrective actions for these violations had been implemented as stated in your reply dated April 17, 1989.

The response directed by this letter and the accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

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Veterans Administration Medical
Center

-2-

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Bill Beach". The signature is written in a cursive style with a large initial "A" and "B".

A. Bill Beach, Director
Division of Radiation Safety
and Safeguards

Enclosure:
Appendix - Notice of Violation

cc:
New Mexico Radiation Control Program Director

APPENDIX
NOTICE OF VIOLATION

Veterans Administration Medical Center
Albuquerque, New Mexico

Docket: 30-02583/90-01
License: 30-01747-02

During an NRC inspection conducted on January 16, 1990, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the violations are listed below:

1. 10 CFR 35.60(c) requires, in part, that individuals use a syringe radiation shield when administering a radiopharmaceutical by injection unless contraindicated for that patient.

Contrary to the above, licensee representatives stated that syringe shields had not been used when administering radiopharmaceuticals by injection between April 1, 1989, and January 15, 1990.

This is a Severity Level IV violation. (Supplement VI)

2. 10 CFR 35.70(e) requires, in part, that the licensee survey for removable contamination once each week all areas where radiopharmaceuticals are routinely prepared for use, administered, or stored.

Contrary to the above, such areas were not surveyed during the weeks ending June 23, August 25, September 15, and October 20, 1989, and January 5, 1990.

This is a Severity Level IV violation. (Supplement VI)

3. License Condition 15 requires, in part, that the licensee conduct its program in accordance with the statements and representations made in the application dated February 24, 1988. Attachment 9.3 of the application requires, in part, that the licensee plot on graph paper or log in a book, each day, the dose calibrator's response for each reference source.

Contrary to the above, none of the above records had been maintained between December 1, 1989, and January 15, 1990.

This is a Severity Level V violation. (Supplement VI)

Pursuant to the provisions of 10 CFR 2.201, Veterans Administration Medical Center is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results

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achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 23rd day of February 1990

FEB 23 1990

In Reply Refer To:
License: 30-01747-02
Docket: 030-02583/90-01

Veterans Administration Medical Center
Nuclear Medicine Section (115)
2100 Ridgecrest Drive, S.E.
Albuquerque, New Mexico 87108

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RIV:NMIS *DM*
GMVasquez:lm
02/20/90

C:NMIS *DM*
CLCain
2/21/90

DM
D:DBSS
ABBeach
2/22/90

IE-07

~~9003130341 JPP~~

Veterans Administration Medical
Center

-2-

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:

A. B. BEACH

A. Bill Beach, Director
Division of Radiation Safety
and Safeguards

Enclosure:
Appendix - Notice of Violation

cc:
New Mexico Radiation Control Program Director

bcc:
DMB - Original (IE-07)
RDMartin
ABBeach
LAYandell
Glenda Jackson OC/LFMB (4503)
*CLCain
*WLFisher
*GMVasquez
*NMIS
*MIS System
*RIV Files (2)
*RSTS Operator
*REHall, URFO

*W/766

APPENDIX

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Veterans Administration Medical Center
Albuquerque, New Mexico

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this 23rd day of February 1990