



525 Couch Avenue  
Kirkwood, Missouri 63122  
314 966-1500

March 5, 1990

Mr. Roy Caniano  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Rd., Bldg. #4  
Glen Ellyn, IL 60137

Dear Mr. Caniano:

Thank you for responding to our most recent letter. In the conversation we had February 28, 1990, you mentioned that further clarification was needed in response to the routine safety inspection in December and the subsequent written notice of violations. The following will hopefully clarify our response.

The first violation identifies our failure to have a copy of a license identifying a visiting authorized user. The physician in question will not be allowed to use medically our Cobalt 60 teletherapy unit until our license is amended to authorize their use of that unit.

Also to prevent a visiting unauthorized user from using our teletherapy unit in the future in violation of 10 CFR 35.27 (a), (a2), we will have in our possession a copy of his or her license issued by the commission or an agreement statement before a visiting user is allowed to medically use our teletherapy treatment unit.

The responsibility to assure that the appropriate records regarding visiting authorized users accompanies our license will be the responsibility of the administrative director of radiation oncology.

The identified violations will be reviewed during our next radiation safety meeting scheduled for March 26, 1990.

Full compliance has been achieved with regard to 10 CFR 35.27 (a), (a2), and an unauthorized user will not be permitted to employ our teletherapy equipment for medical purposes.

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With regard to the specific incident that resulted in our receiving a notice of violation dated February 5, 1990, an amendment to our license #24-11858-02 is in the process of being requested (reference previous letter dated February 20, 1990) that will allow the previously undocumented visiting user to become an authorized user on our teletherapy license.

The second violation was for our failing to have adequate personnel radiation exposure records according to 10 CFR 20.401 (A) and form NRC-5.

Since the inspection, and before the notice of violation was received, the missing birth dates for the two individuals in radiation oncology have been added to our personnel radiation exposure records.

To prevent this situation from recurring, we do now, and will continue to, review the personnel exposure records for the radiation oncology personnel. This review will be verified by myself with an initial and date.

As of this date our radiation oncology personnel records are in compliance with the NRC guidelines and monthly review of these records will assure continued compliance. The information presented here should be a more complete response to the notice of violations we received, as you requested.

Please do not hesitate to call if you have any further questions.

Sincerely,

*Fran Henderson*

Fran Henderson, RTT, BSBA  
Director, Radiation Oncology

FH/db