



DEPARTMENT OF VETERANS AFFAIRS
Medical Center
1055 Clermont Street
Denver CO 80220

FEB 25 1993

In Reply Refer To: 554/114

U.S. Nuclear Regulatory Commission, Region IV
ATTN: Mr. L. J. Callan, Director
Division of Radiation Safety and Safeguards
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

SUBJECT: Notice of Violation, dated February 2, 1993
License No. 05-01401-02, Docket No. 030-01234

Dear Mr. Callan,

This letter is in response to your letter of February 2, 1993, NRC Inspection Report 030-01234/93-01 (Notice of Violation). The two violations and the appropriate responses are identified as they are in the Notice of Violation letter.

A. Failure to conduct surveys in accordance with 10 CFR 35.70(a) at the end of each day of use.

1. This violation occurred because the Technologists did not realize that a survey was to be done at the end of each day of use. A number of factors contributed to this. First, their position description is outdated and include tasks for which they are not held accountable. Second, there had been no call-in check sheet nor orientation check sheet for new personnel. Finally, the Nuclear Medicine Technologists do not perform the daily surveys, but the Radiation Safety Officer does. The combination of these factors made it easy for the survey to be forgotten on a call-in.

2. At a staff meeting held on February 12, 1993, the Technologists were officially informed of the requirement to perform a survey on each day of use. The findings of the NRC Inspector had been communicated to them shortly after the inspection. The report and Notice of Violation were given to them when received.

3. The conduct of surveys on each day of use will be made an element of their performance evaluation. However, because of personnel regulations, this cannot be done until April 1, 1993. Rating criteria cannot be changed during the last ninety days of the rating period which ends March 31, 1993. The form on which daily surveys are recorded has been modified and two rows for Saturday and Sunday have been added. A call-in check sheet is being developed and is expected to be implemented by March 1, 1993. An orientation check list for Nuclear Medicine Technologists is being developed and is expected to be available for use by March 15, 1993. It will be reviewed by the current Technologists both to insure that they understand it's contents and for their input.

4. It is expected that all corrective action on this violation will be completed by April 15, 1993.

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B. Sealed source inventory records which do not include all of the information required by 10 CFR 35.59(g), omitting model number, nominal activity, and location.

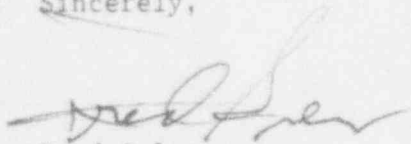
1. This violation occurred because the Radiation Safety Officer had not reviewed section 35.59 of Title 10, Code of Federal Regulations (CFR), when he created the template used to prepare sealed source inventory and leak test reports.

2. This violation has been corrected. The template has been changed to include all of the required information. The most recent leak test report, which occurred after the inspection, was prepared using the amended form (see attachment). The new template is stored electronically and will be used to report future leak test results.

3. The editing of the template to include the required information and its use should prevent reoccurrence. Note, a copy of the latest report is provided (see attachment) for information only, we are not committing to using this particular template. A notation has been added to the template to consult 10 CFR 35.59 before changing it.

4. This violation is considered corrected at the present time.

Sincerely,



Fred Salas
Medical Center Director

Enclosure:
Sealed Source Inventory and Leak Test

cc:
Milton Gross, M.D., Director
Nuclear Medicine Service (111E)
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, D.C. 20420

DEPARTMENT OF VETERANS AFFAIRS
MEDICAL CENTER, DENVER

Sealed Source Quarterly Inventory and Semi Annual Leak Test

February 17, 1993

I. Equipment: Well counter, sodium iodide detector and multichannel analyzer, Canberra Series 20, Model 2884, Serial No. 986484.

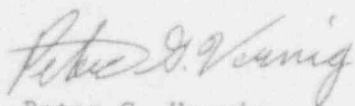
II. Backgrounds: 1000 second count:

Window for: Cs-137: 42.2 cpm; Co-60: 38.3 cpm; Co-57: 57.1 cpm;
Ba-133: 143.2 cpm.

III. Wipe counts: All counts were one minute.

SOURCE DESCRIPTION AND MODEL NUMBER	ISOTOPE & mCi *	SERIAL NO.	GROSS COUNTS	NET COUNTS	EFF.	nCi
Calib. Bottle, NEN Mod.# NES 356	Cs-137 .147	319-076-09	39	0	.22	<0.03
Calib. Bottle, CIS Mod.# 971	Co-57 .329	971-1176	76	19	.73	≤0.02
Calib. Bottle, NEN Mod.# NES 358	Ba-133 .364	319-032-17	142	0	.57	<0.02
Tech. Ops. Calib Mod.# 64-773	Cs-137 128	S-571	42	0	.22	<0.03
U.S. Nuclear Mod.# FCS1	Cs-137 .552	V969	50	7.8	.22	≤0.03
Gamma Cell 220, AECL Mod.# 167	Co-60 716 Ci	N/A				
Wipe 1			33	0	.19	<0.03
Wipe 2			41	2.7	.19	<0.04
Wipe 3			43	4.7	.19	≥0.04
Wipe 4			42	3.7	.19	≥0.04

Energy windows used Cs-137: 609-754 keV; Co-57: 92-172 keV; Co-60: 1095-1446 keV; Ba-133: 271-566 keV. * Activity as of 1 Jan 93. NES 356, NES 358, & CIS 971 are located in room 2D114. Model 64-773 is located in room 2D120. Model FCS1 is located in radioactive waste handling room basement building 19. Model 167 is located in the subbasement of building 21.



Peter G. Vernig
Radiation Safety Officer

IMA/RS-1/93 Retain 5 years. Consult 10 CFR 35.59 for required information before changing this form.