



1430 DeKalb Street, Norristown, PA 19401  
215-278-8200

April 27, 1993

James Dwyer, Acting Chief  
Medical Inspection Section  
Division of Radiation Safety and Safeguards  
U.S. N.R.C., Region 1  
475 Allendale Road  
King of Prussia, Pa. 19406-1415

Ref: License No. 37-01563-03  
Routine Inspection No. 93-001  
Docket No. 030-02989

Dear Mr. Dwyer:

This correspondence is in response to your letter dated March 31, 1993, concerning the routine safety inspection at our facility on February 19, 1993. The following information and plan for corrective action are forwarded for your review and approval.

The Radiation Safety Officer has reviewed 10 CFR Parts 19, 20, and 35; Regulatory Guide 10.8, and the Nuclear Medicine Policy and Procedures Manual. He currently understands all the responsibilities placed on the Radiation Safety Officer by the NRC. He has personally rewritten the Nuclear Medicine Manual to ensure compliance with the regulations. In addition, he has conducted the required annual management briefing to insure involvement of management in the Radiation Safety Program.

All procedures and tests requiring the RSO's signature will be signed upon completion. The RSO will continue to work closely with the physicist to improve involvement in and supervision of the Radiation Safety Program as required by 10 CFR 35 and the condition of the license.

Further, with respect to the items in the Notice of Violations, the following corrective actions have been taken:

A. Security of radioactive materials:

Combination locks have been placed on the hot lab doors. These locks will ensure ready access to the Nuclear Medicine technologists, yet maintain a secure area when no one is physically present. All technologists have been re-instructed as to security requirements. We are currently in compliance with the NRC regulations concerning security of radioactive materials.

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COMMUNITY HOSPITAL  
OWNED AND OPERATED BY  
THE MISSIONARY SISTERS OF  
THE MOST SACRED HEART OF JESUS

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- B. Training of Nuclear Medicine technologists in purpose and function of protective devices:

Use of survey instruments was reviewed with the Nuclear Medicine technologists, including the use of dedicated check sources. Yearly inservices will be provided by the consultant medical radiation physicist, to ensure that the technologists are familiar with all safety equipment. We are currently in compliance with NRC regulations concerning training.

- C. Quarterly meeting of the Radiation Safety Committee:

The Radiation Safety Committee will meet on a quarterly basis. This has been emphasized to management, together with the need for a quorum and the NRC requirement that the Radiation Safety Officer and management be present. We are currently in compliance.

- D. Management Representation at Radiation Safety Committee meetings:

See Item C above. All Radiation Safety Committee meetings will be scheduled to ensure that management is represented.

- E. Quarterly Review of the Radiation Dosimetry Records:

The Radiation Safety Officer will continue to present quarterly reviews of radiation dosimetry records to the Radiation Safety Committee. This will be clearly documented in the minutes.

- F. Yearly review of the Radiation Protection Program:

The Radiation Safety Officer has completed a review of the Radiation Safety Program, including a complete revision of the Nuclear Medicine Manual. This review will be presented during the April 27, 1993 Quarterly Radiation Safety Committee meeting.

- G. Dose Calibrator Linearity:

The Nuclear Medicine technologists have been instructed in the proper procedures for performing dose calibrator tests. We are currently in compliance with NRC regulations.



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H. Radiation Safety Committee meeting minutes:

All future Radiation Safety Committee meeting minutes will include all required information. The format for recording the minutes has been changed. We will be in compliance from our April 1993 meeting.

I-J. Radiation Safety Officer review:

The Radiation Safety Officer has reviewed 10 CFR Parts 19, 20 and 35; Regulatory Guide 10.8; and the Nuclear Medicine Policy and Procedures Manual, as indicated above. He currently understands the responsibilities placed on the Radiation Safety Officer by the NRC. All procedures and tests requiring the Radiation Safety Officer's signature will be signed upon completion. We are currently in compliance.

K. Establishment of trigger levels:

Trigger levels have been established and approved by the Radiation Safety Officer. These trigger levels are present on the survey/wipe test forms. We are currently in compliance with NRC regulations.

I. Waste Disposal Records:

The Waste Disposal Records have been updated to include background dose rate readings. We are currently in compliance.

If you have any further questions, or if I can be of further assistance, please contact my office at 278-8303.

Sincerely,

J. Russell Walsh  
President

JRW/nrr

ANNUAL MANAGEMENT REVIEW  
OF  
RADIATION SAFETY PROGRAM

DATE: 25 MAR 93

PRESENTED BY: NICHOLAS R. RORICK, M.D., RSO

PRESENT:

J. RUSSELL WALSH, PRESIDENT  
H. McWILLIAMS, M.D., VPMA  
C. CRONLEY, RN, MSN

P. JAYAKUMAR, ARRT  
S. KOTIHAL, ARRT  
T. JACQUETTE, CNMT

SUBJECTS COVERED:

U.S. NRC and Commonwealth of Pennsylvania License terms and conditions.

Sacred Heart Hospital RSC and RSO Duties and Responsibilities.

SHH Nuclear Medicine Program, including revisions to Nuclear Medicine Policy and Procedures Manual

General Radiation Protection Program, including ALARA concept, investigational levels, &c.

Nuclear Medicine area, posting and procedures; Housekeeping, Security.

Storage and Disposal of Wastes

Quality Control Program; Records

By: NICHOLAS R. RORICK, M.D., RSO