

JUN 27 1990

In Reply Refer To:
License: 35-17087-01
Docket: 30-12175/90-01

St. Mary's Hospital
ATTN: M. T. Brasseaux, Administrator
P.O. Box 232
Enid, Oklahoma 73702-0232

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Ms. L. L. Kasner of this office on May 29, 1990, of the activities authorized by NRC Byproduct Material License 35-17087-01. The findings of this inspection were discussed with the radiation safety officer (RSO) and members of the administrative and technical 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.

The inspection included a review of training provided to technical, nursing, housekeeping, and security staff members; the receipt, use, inventory, and disposal of byproduct material; protective measures and radiation surveys associated with the preparation and administration of radiopharmaceuticals; and dose calibrator and survey instrument calibration procedures. The inspector also reviewed records of the radiation safety audits conducted by the RSO and assessed the roles that management and the RSO serve in directing licensed activities.

The inspector reviewed the actions you had taken with respect to the violations observed during the previous inspection conducted on October 28-29, 1987. She observed that corrective actions had been implemented for the violation regarding waste storage area radiation surveys and noted that the measures implemented had been effective in preventing recurrence of this violation.

Corrective actions taken in regard to a second violation, involving procedures used to conduct dose calibrator accuracy and linearity tests, were also reviewed during this inspection. The inspector observed that although you had implemented corrective actions which addressed some items related to these procedures, your corrective actions had not been fully effective regarding procedures used to conduct dose calibrator linearity tests. This problem is described in Violation 3 of the enclosed Notice of Violation.

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LLKasner:nh
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C:NMIS *one*
CLCain
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ABBeach
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The inspector also noted that the RSO had conducted a comprehensive program audit during the first quarter of 1990. She observed that although several minor record problems had been corrected as a result of this audit, some problems associated with procedures which were reviewed during the audit had gone undetected. These problems are the subject of the Notice of Violation enclosed with this letter. Although we are encouraged that such audits are conducted, we wish to emphasize the need for further attention to detail in order for the audit to be effective in identifying potential problems or violations of license conditions and NRC requirements.

The inspector reviewed several issues with the RSO at the conclusion of the inspection. Although these do not represent violations of NRC requirements, they do require further attention and monitoring by the radiation safety committee. One of these is personnel exposures for staff members working with byproduct material. Although the inspector noted that exposures were below regulatory limits, she observed that extremity exposures were higher than those observed in other similar programs. In accordance with your ALARA program, we encourage you to focus attention to reducing personnel exposures, particularly extremity doses, and ensure that the required protective measures are used.

As reviewed with the RSO, the individuals responsible for conducting licensed activities should closely review the license application and the conditions of the license to ensure that the procedures contained therein have been implemented as described.

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 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.

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:
Oklahoma Radiation Control Program Director

St. Mary's Hospital

-3-

bcc:

DMB - Original (IE-07)

RD Martin

AB Beach

LA Yandell

MRodriguez, OC/LFDCB (4503)

*CLCain

*WLFisher

*Inspector

*NMIS

*MIS System

*RIV Files (2)

*RSTS Operator

*REHall, URFO

*W/766