

Biomedical Diagnostic Services, Ltd.
 Ram Gunabalan, M.D.
 5339 Kellen Lane
 Bloomfield Hills, MI 48302

September 27, 1990

United States Nuclear Regulatory Commission
 Dr. Bruce Mallett
 Chief Nuclear Materials Safety Branch
 Region III
 799 Roosevelt Road
 Glen Ellyn, Illinois 60137

License File
 21-20279-01

Dear Dr. Mallett:

These are additional responses to my letter, dated August 23, 1990.

- Violation 1.** Meeting with employees occurred at 10:00 A.M. August 15, 1990. The persons attending the meeting included; (1) Karen Pruett, Office Manager, (2) Marcy Ucinski, Biller, and (3) R. Gunabalan, M.D., RSO.
- Topics discussed included avoiding handling all radioactive materials at all times during the employment. They were instructed as to the nature of radiation and precautions to avoid contamination by keeping a safe distance away from radioactive materials with adequate shielding between the source and the individual. To prevent recurrence of this violation, spot checks by the Radiation Safety Officer would be performed.
- Violation 2.** This violation has been corrected. To avoid further recurrence of this violation, the quarterly checklist by the RSO would include a dose calibrator including check constancy.
- Violation 3.** Syringe shields are available. As I had indicated in the conference, the office is temporarily inactive, so they are not being used even though they are available. Again, to prevent recurrence, the quarterly checklist by the RSO and spot checks would avoid a recurrence of such a violation.
- Violation 4.** Wipe tests have been done as indicated previously. However, since the office is currently inactive, wipe tests are not being done as radioactive materials are not being used at this time. Periodic review of swipes will be done at least on a monthly basis.
- Violation 5.** Training new employees would include instructions in general radiation safety as indicated in the previous enclosure. All technologists employed in the facility would be expected to continue their education through various programs offered by their respective societies. In addition, they will participate in the radiation safety meetings with the RSO on a quarterly basis.

Page 2

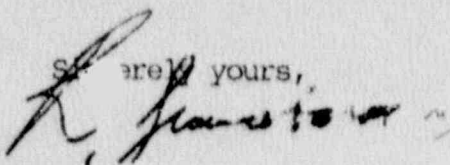
United States Nuclear Regulatory Commission
Dr. Bruce Mallet

Violation 6. Film badges will be used by all employess in the facility. The film and finger badges will be used by the technologists. The employees are wearing the badges. Again, the office is temporarily inactive. Until it is reactivated, no further checks are being done at this time.

I hope the additional information provided is adequate.

Thanking you in your help and cooperation,

Sincerely yours,

A handwritten signature in dark ink, appearing to read "R. Gunabalan". The signature is written in a cursive style with a large initial "R" and a long horizontal stroke extending to the right.

Ram Gunabalan, M.D.

RG:pas

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Chief Nuclear Materials Safety Branch
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799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Dr. Mallett:

This is in reponse to your letter, dated July 24, 1990 as the result of an inspection of our Ypsilanti facility on June 28, 1990. The following are the violations and corrective actions taken.

- Violation 1. The secretarial and non-secretarial staff have been instructed in the basics of radiation safety.
- Violation 2. Enclosed is a copy of instructions read and understood by all new employees to the facility.
- Violation 3. Wipe tests have since been performed for removable contamination.
- Violation 4. Dose calibration tests have since been performed as required by the license conditions.
- Violation 5. Personnel dosimeters have all been obtained since the date of the violation.
- Violation 6. Syringe shields which were on order at the time of inspection have since been delivered.

In addition, certain concerns were expressed at the conference on July 31, 1990.

- 1. Enclosed is a checklist of items to be done before a new facility is opened.

AUG 24 1990

IE07


Page 2

2. The violations listed above would have been detected in the first quarter of our internal control program, that you are aware of.

3. With the new instructions sheet and checklist for new facilities, I believe that our internal controls are satisfactory.

Thanking you,

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. Gunabalan".

Ram Gunabalan, M.D.

RG:ps

enclosures

GENERAL INSTRUCTIONS FOR ALL NEW EMPLOYEES

1. You are employed by a facility that uses radio-active materials, which could be hazardous to you and others around you, if not properly handled.
2. You should familiarize yourself with the areas where radio-materials are received and handled. Be aware of the radiation warning signs.
3. Do not handle any object marked with a radiation sign, unless you are specifically trained to do so.
4. Always wear a radiation badge while working in the facility. This is for your own safety. The badge reports will be notified to you showing your radiation exposure on an annual basis.
5. Remember that keeping your distance and protective shielding over radio- active sources will minimize your radiation exposure.
6. If you are ever required to handle radio-active materials, do so only after fully being instructed by the Radiation Safety Officer of the facility - Dr. Gunabalan.
7. I have fully read and understood the above.

New Employee hired on:

Position:

NEW LOCATION CHECKLIST

1. Dose Calibration (a) Geometry
(b) Calibration
2. Survey Meters (a) Calibration
(b) Documentation
3. Film Badges delivered on _____
4. Radioactive sources delivered on _____
5. Syringe shields delivered on _____
6. Radiation signs Posted
7. License and Part 35 Posted
8. Gloves delivered on _____
9. Shield counter available on _____
10. Gamma camera - field shield satisfactory _____