NOV 1 9 1990

In Reply Refer To: License: 40-00238-04 Docket: 030-03231/90-01

Rapid City Regional Hospital, Inc. ATTN: Gary P. Riedmann, President 353 Fairmont Boulevard Rapid City, South Dakota 57701

Gentlemen:

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PNU

Thank you for your letter of October 24, 1990, in response to our letter and attached Notice of Violation both dated October 15, 1990. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine whether full compliance has been achieved and will be maintained.

> Sincerely, Original Signed By: A. B. BEACH A. Bill Beach, Director Division of Radiation Safety and Safequards

cc: South Dakota Radiation Control Program Director bcc w/copy of licensee letter: DMB - Original (IE-07) RDMartin ABBeach LAYandell MRodriguez, OC/LFDCB (MS 4503) CLCain WLFisher WLHolley NMSIS MIS System RIV Files (2) **RSTS** Operator RIV: NMLSAF C:NMS WLHolley:c' CLCain 11/15/90 11/15/



October 24, 1990

RAPID CITY REGIONAL HOSPITAL

United States Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555

"REPLY TO A NOTICE OF VIOLATION"

LICENSE: 40-00238-04 DOCKET: 30-03231/90-01

Gentlemen:

B.

This letter is in response to your October 15, 1990 letter and appendix (Notice Of Violations) concerning the September 10, 1990 inspection. Our response to each violation is listed below. Number (5) addresses the issues of whether the violation was related to the performance of RSO duties by someone other than the RSO.

A. (1) The individual had been instructed in past Radiation Safety Programs to wear disposable gloves at all times while handling radioactive materials. He stated that he became nervous with the inspectors present and simply forgot to put the gloves on while he moved the sealed vial from the dose calibrator to a lead shield. Even though he used a forceps, he said all he could think of was to do this task quickly.

(2) The RSO discussed the use of disposable gloves with this individual and all other technologists on September 11, 1990. At the September 25, 1990 monthly Nuclear Medicine Department meeting, all aspects of Radiation Safety were discussed and all technologists were told to read and sign the updated Radiation Safety policies. On October 10, 1990 an annual Radiation Safety Training Program was held in which all technologists covered all aspects of Radiation Safety (including wearing gloves while handling radioactive materials). All individuals will wear disposable gloves at all times while handling radioactive materials.

(3) At the annual Radiation Safety Program, the RSO or the Department Supervisor will remind all of the technologists to wear disposable gloves. Between annual Radiation Safety Programs, the RSO and department supervisor will remind and monitor all technologists on the use of disposable gloves.

- (4) Full compliance was achieved September 11, 1990.
- (5) The RSO assigned this duty to the Nuclear Medicine Supervisor.
- (1) The batteries were dead in this portable radiation measure survey instrument.

(2) The batteries were replaced immediately with spare batteries that are stored with the instrument and it operated properly.

- (3) The instrument will be checked every morning for proper operation.
- (4) The instrument was fully operable on September 10, 1990.
- (5) The RSO assigned this duty to the Nuclear Medicine Supervisor.

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RAPID CITY REGIONAL HOSPITAL

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BLACK HILLS REHABILITATION HOSPITAL

353 FAIRMONT BLVD., RAPID C'TY, SD 57701 (605) 341-1000 RUSHMORE HEALTH SYSTEM

PO. BOX 2720 RAPID CITY, SD 57709 (605) 341-8100

United States Nuclear Regulatory Commission October 24, 1990 Page 2 ---

C. (1) A new dedicated check source was on order, but had not been received. The instrument had been calibrated with a dedicated check source on June 1, 1990 by Midwest Radiation Physicists, but not all of the technologists knew which check source and proper geometry was involved at the time of the survey.

(2) At the September 26, 1990 Nuclear Medicine Department meeting all of the survey instruments, check sources and check procedures were reviewed to insure complete understanding. On September 4, 1990 a new check source was ordered; it arrived on September 25, 1990. Midwest Radiation Physicists rechecked the instrument for apparent exposure rate to the new dedicated check source on October 14, 1990.

(3) The instrument will be checked with a dedicated check source before every use for apparent exposure rate. The instrument will be checked by Midwest Radiation Physicists at the time of our annual calibration for the apparent exposure rate to the dedicated check source.

(4) Full compliance was achieved October 14, 1990.

(5) This was a duty assigned to the Nuclear Medicine Supervisor.

I hope we have answered all of your concerns, and would be glad to submit further information if you so desire.

Sincerely, Kuduna

Gary P. Riedmann President

cc: United States Nuclear Regulatory Commission Regional IV, Director 611 Ryan Plaza Dr., Suite 1000 Arlington, TX 76011

> South Dakota Radiation Control Program Director Foss Building, 523 East Capitol Pierre, SD 57501