

Logan General Hospital

Office of General Counsel

20 Hospital Drive

Logan, West Virginia 25601

George L. Partain
General Counsel
Senior Vice-President

FAX NO: (304) 792-1180
(304) 792-1353

December 16, 1993

J. Phillip Stohr, Director
Division of Radiation Safety
& Saieguards
Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30323-0199

VIA FAX (404) 331-5559

Re: Confirmatory Action Letter

Dear Mr. Stohr:

In response to your letter of December 10, 1993, I am enclosing herewith the following:

1. Memorandum to Elbert M. Huffman, Chief of Security, from Hartsell Phillips of the Nuclear Medicine Department.
2. Memorandum to Harold McMillen, Chief Executive Housekeeper, from Hartsell Phillips of the Nuclear Medicine Department.
3. New Security Policy adopted by Logan General Hospital.
4. New protocols for training and instructions for security personnel related to Nuclear Medicine Department entry, which indicates the names of the security officers and the date training and instructions were administered for Nuclear Medicine Department entry.
5. New protocols for training and instructions for housekeeping employees which indicates the names of the employees and the dates they were administered the prescribed training.

If you need anything additional with respect to the foregoing, please advise. On or before December 31, 1993, we will confirm we have accomplished Item 2 in your letter.

Very truly yours,

George L. Partain
George L. Partain
Senior Vice-President
and General Counsel

GLP:ab
Enclosures

Memo
Logan General Hospital

From the desk of Hartsell Phillips, R.S.O.

TO: Elbert M. Huffman, Chief of Security

RE: Nuclear Medicine Department

DATE: December 10, 1993

Dear Elbert:

With one exception, which is hereinafter detailed, no person other than a security officer who is present for a security check shall have access to the Nuclear Medicine Department unless a Nuclear Medicine Department employee is present. Security shall allow access to the Nuclear Medicine Department to a courier delivering a radioactive shipment, but at all times the courier is in the department, the security officer shall remain with the courier. The security officer should carefully check and make sure that the area is secure once the courier exits.

This will also advise that we need to have your security force undergo training concerning the Nuclear Medicine Department on or before December 17, 1993.

Very truly yours,

Hartsell Phillips
Hartsell Phillips, R.S.O.

HP:ab

Memo
Logan General Hospital

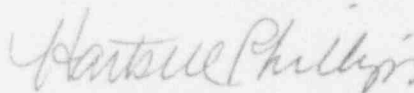
From the desk of Hartsell Phillips, R.S.O.

TO: Harold McMillen, Chief Executive Housekeeper
RE: Nuclear Medicine Department
DATE: December 10, 1993

Dear Harold:

This will confirm that no housekeeping personnel shall be permitted access to the Nuclear Medicine Department except in the presence of a Nuclear Medicine Department employee. This will also advise that we need to have all of your housekeepers that will clean the Nuclear Medicine Department to have training concerning the Nuclear Medicine Department on or before December 17, 1993.

Very truly yours,

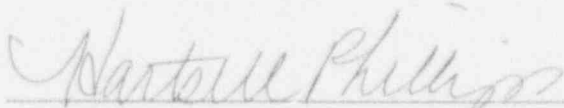


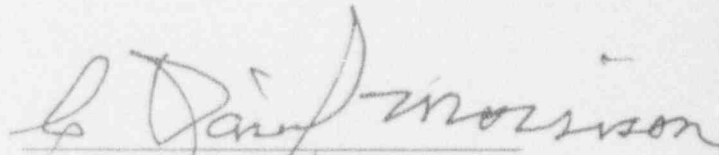
Hartsell Phillips, R.S.O.

HP:ab

SECURITY POLICY
CONTROL OF ACCESS TO NUCLEAR MEDICINE
LOGAN GENERAL HOSPITAL

- A. The Nuclear Medicine Department shall be locked during all off duty hours and at any time during regular working hours when a technologist is not physically present.
- B. No housekeeping personnel is allowed to enter the Nuclear Medicine Department unless a technologist is physically present. All housekeeping personnel shall have a yearly in-service pertaining to radiation safety.
- C. For delivery of packages during off duty hours, security personnel will escort delivery personnel to the Nuclear Medicine Department, unlock the door to allow access for the courier and immediately re-lock the department. All security personnel will have a yearly in-service pertaining to radiation safety.


Radiation Safety Officer


Hospital Administrator

*SEE ATTACHMENT

PROTOCOLS FOR TRAINING AND INSTRUCTIONS FOR SECURITY PERSONNEL

I. INTRODUCTION

The Nuclear Medicine Department and downstairs storage room are areas of the hospital where radioactive materials are stored and used. To prevent injury to persons who might not be aware of the possible harm to themselves or others, these areas must be kept locked at all times unless Nuclear Medicine Department employees are in the department. Security personnel shall be instructed as to what danger signs to look for. Only those Security officers who have been trained shall enter the department. With one exception which is hereinafter detailed, no person other than a security officer who is present for a security check shall have access to the Nuclear Medicine Department unless a Nuclear Medicine Department employee is present. Security may allow access to the Nuclear Medicine Department to a courier delivering a radioactive shipment, but at all times the courier is in the department, the security officer shall remain with the courier. The security officer should carefully check and make sure that the area is secure once the courier exits.

II. INSTRUCTION

- A. Doors shall be posted with signs saying "CAUTION RADIOACTIVE MATERIALS" which indicates that the room is a place where radioactive materials are stored and/or used. Always enter the room and look around for signs or conditions indicating caution.
- B. Any cabinet, refrigerator, package, bottle or other container marked with a yellow and red sign, "CAUTION RADIOACTIVE MATERIAL" is a potential source of radiation exposure. Such items should not be moved or touched except by Nuclear Medicine personnel.
- C. Couriers delivering radioactive packages shall be instructed to page security and wait until the security guard arrives. The security guard will then inspect the package for signs of wetness, damage or crushing. He shall note the condition on the log sheet. If the package is damaged, the security guard will immediately contact the R.S.O. and detain the courier until he arrives. If the R.S.O. is not available, the on-call Nuclear Medicine Technologist is to be contacted. If the package is acceptable, the security guard shall

escort the courier to the Nuclear Medicine Department and the package shall be locked in the hot lab. Following this, the department will be immediately secured. Work quickly and efficiently, taking with you only the courier and the shipment. DO NOT SMOKE, DRINK OR EAT IN THIS AREA.

Radiation Safety Officer Nathan Phillips

Office Phone 109

Home Phone (304) 752-1682

III. Training and Instructions for Nuclear Medicine Department entry received as follows:

1. Blair H. Jones Date 12-14-93
2. Ronald S. Perkins Date 12-14-93
3. Drewie Meade Date 12/14/93
4. _____ Date _____
5. _____ Date _____
6. _____ Date _____
7. _____ Date _____
8. _____ Date _____
9. _____ Date _____
10. _____ Date _____

PROTOCOLS FOR TRAINING AND INSTRUCTIONS FOR HOUSEKEEPERS

I. INTRODUCTION

The Nuclear Medicine Department is an area of the hospital where radioactive materials are stored and used. To prevent injury to persons who might not be aware of the possible harm to themselves or others, this department is kept locked and may only be entered by housekeeping employees when a Nuclear Medicine Department employee is present. Housekeepers shall be instructed as to danger signs to look for upon entering.

II. INSTRUCTION

- A. Doors posted with signs saying "CAUTION RADIOACTIVE MATERIALS" indicate that the room is a place where radioactive materials are stored and/or used. Enter the room and look around for other signs, or conditions indicating caution. Work quickly and efficiently, taking with you only the material needed to clean the area. **DO NOT SMOKE, DRINK OR EAT IN THIS AREA.**
- B. Any cabinet, refrigerator, package, bottle or other container marked with a yellow and red sign, "CAUTION RADIOACTIVE MATERIAL" is a potential source of radiation exposure. Such items should not be moved or touched except by Nuclear Medicine personnel.
- C. Should you notice damage to or leakage from any object labeled as described above, **DO NOT ATTEMPT TO CLEAN THE AREA.** Advise the Nuclear Medicine Department employee when present.

We will notify you when you can return to this area and complete your duties.

- D. Upon completion of the cleaning detail, leave the area with the cleaning material you brought with you.
- E. At no time should you allow persons, not assigned to the housekeeping department, to clean the Nuclear Medicine Department or accompany you into this area.

III. CLEANING DUTIES

Empty trash containers: daily- do not touch trash with your hands. Do not empty any container marked "RADIOACTIVE MATERIAL".

Dust: twice a week at least- windows sills, file cabinets, book shelves, chairs, desk tops, radiators, tabletops (not covered with absorbent paper), refrigerator, gamma camera (except instrument panel).

Wet mop floor: daily or when necessary.

Clean sink: daily.

IV. Training and Instructions given to:

1. Deborah Carter Date 12-14-93
2. Doug Coyle Date 12-14-93
3. Billy E Jones Date 12-14-93
4. James Deters Date 12-14-93
5. Ruby Flint Date 12-14-93
6. Gandy Sherman Date 12-14-93
7. Arnold L. Campbell II Date 12-14-93
8. Roger Hayes Date 12-14-93
9. Harold Hicks Date 12-14-93
10. Larry J. Brown Date 12-14-93
11. Valencia Mitchell Date 12-14-93
12. Mr. Donnie Kubow Date 12-14-93

LOGAN GENERAL HOSPITAL

20 Hospital Drive
Logan, West Virginia 25601
FAX NO: (304) 792-1180

TO: J. Phillip Stohr

DATE: 12-16-93

TIME TRANSMITTED: 1:53 @

TELECOPIER NO: (404) 331-5559

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INFORMATION SHEET:

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FROM:

CONFIRMATION NUMBER:

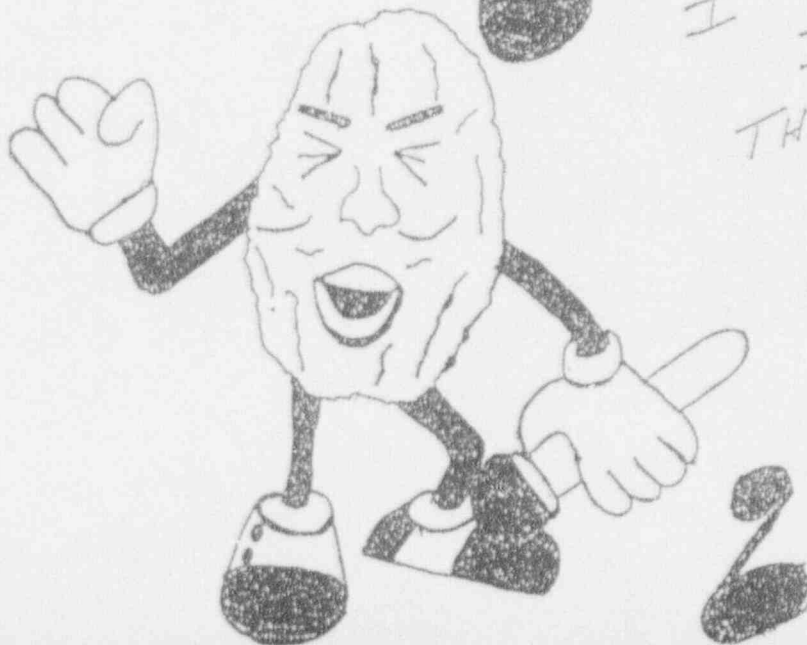
- C. David Morrison, Administrator
- George L. Partain, General Counsel
- John C. Browning, Personnel Director

- (304) 792-1247
- (304) 792-1353
- (304) 792-1190

COMMENTS:

OPERATOR:

Alisa Bentley



BABY,
I HEARD
IT
THROUGH
THE
FAX LINE!