



DEPARTMENT OF VETERANS AFFAIRS

Medical Center  
2100 Ridgecrest Drive SE  
Albuquerque NM 87108

JAN 26 1994

In Reply Refer To:

\*U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

This is in response to your letter of January 5, 1994, referring to the unannounced inspection held December 8-9, 1993, the Nuclear Regulatory Commission (NRC) Inspection Report No. 030-02583/93-01, and the Notice of Violation (License No. 30-01747-02, Docket No. 30-02583).

With regard to the noted violations, the following comments are submitted:

**Violation A:** Licensee failed to retain in an auditable form a record of the evaluations and findings of an annual Quality Management Program (QMP) review performed during 1992.

**Reason for the Violation:** The review as stated in the licensee's QMP is done annually as part of the in-house ALARA audit. Until now, the audit checklist was used only to document discrepancies to be reported to the Radiation Safety Committee (RSC) and corrected. Upon documenting discrepancies, the audit checklist was discarded.

**Corrective steps that have been taken and results achieved:** The Radiation Safety Officer (RSO) has been instructed to maintain the audit checklist for the required three year period and ensure the audit checklist fully covers the review parameters stated in the licensee's QMP.

**Corrective steps to be taken to avoid further violations:** The RSO will be required to report to the RSC the full results of the QMP review at the RSC meeting falling within the quarter in which the annual ALARA audit is performed. Review will become part of the minutes of that meeting.

**Date when full compliance will be achieved:** An additional review for compliance prior to the close of 1993 was accomplished, documented and presented during the fourth quarter RSC meeting. We are presently in compliance with the requirement.

**Violation B:** The licensee had not retained records of quarterly physical inventories of sealed sources in its possession between July and September 1993.

**Reason for Violation:** The RSO could not find the records pertaining to the completed third quarter inventory.

**Corrective steps that have been taken and results achieved/Corrective steps to be taken to avoid further violations:** The RSO has been instructed to ensure his inventory lists are filed in accordance with the suggested filing format in Regulation Guide 10.8.

**Date when full compliance will be achieved:** Full compliance achieved January 10, 1994.

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Thank you and your staff for your helpful suggestions on how to improve our radiation safety program. If you have any questions, please do not hesitate to contact my office.

Sincerely yours,



R. Michael Harwell  
Director

cc: U.S. Nuclear Regulatory Commission  
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