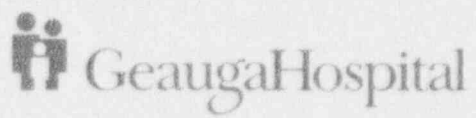


*Reichhold*



12/14/93

B.J. Holt, Chief  
Nuclear Materials Inspection, Section 1  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

RE: Reply to a Notice of Violation: NRC Inspection 11/5/93  
NRC License No. 34-09457-02  
Docket No. 030-02788

Dear Ms. Holt:

The following information is in response to the routine safety inspection conducted by Mr. W.P. Reichhold on the above referenced date. The two violations are discussed below.

**VIOLATION**

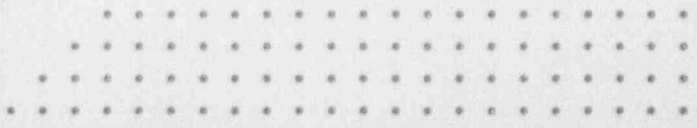
- 1. "... the licensee had not applied for and received a license amendment before it added the Cardiology Laboratory as an area of use. Specifically, on September 1, 8, and 22, 1993, the licensee used Technetium-99m in the Cardiology Laboratory, but this area was not authorized as a place of use."

**RESPONSE**

- 1. It is request that the violation concerning the Cardiology Laboratory not being amended to the hospital's NRC license be rescinded from the Notice of Violation. In discussing this matter with the NMA Medical Physics Consultation office in Cleveland, it was found that a letter had been submitted to the Acting Chief of NRC Region I on 10/5/93 requesting official interpretation regarding the regulatory requirement to add stress labs to NRC licenses. In a subsequent conversation with Frank Costello, Chief Medical Licensing D, it was suggested that the request for interpretation be submitted to the General Counsel. A letter was submitted to William Parler with the Office of General Counsel, U.S. Nuclear Regulatory Commission in Washington, D.C. on 11/10/93 requesting an official interpretation regarding the inclusion of a remote treadmill room on the NRC license. As of the dates of this response, no

9402080047 940126  
PDR ADOCK 03002788  
C PDR

DEC 27 1993



interpretation had been received by NMA. Although the final interpretation has not been received, it is respectfully requested that the violation be rescinded until a final interpretation can be clarified by the Office of General Counsel. Copies of the letters submitted to Region I and the Office of General Counsel are included with this response.

Although the Cardiology Laboratory is not listed as an authorized place of use on our NRC license, the room is surveyed each day of use with a low level G-M meter, and the room is wipe tested for removable contamination each week. Records of these surveys are maintained in the department.

#### VIOLATION

2. "... on numerous occasions in 1992 and 1993, the licensee's "written directives" for administration of quantities greater than 30 uCi of Sodium Iodide 1-131, were not dated by the authorized user. Specifically, on February 2 and 22, 1993, the licensee's "written Directives" for administration of therapeutic dosages of Sodium Iodide 1-131 were dated by the referring physician and not the authorized user."

#### RESPONSE

2. The authorized users for the hospital were signing the written directive for all thyroid therapy procedures, as well as signing and dating the radiotherapy worksheet upon administration. Although the radiotherapy worksheet was being signed and dated by the authorized user, the written directives were many times not dated by the authorized user.

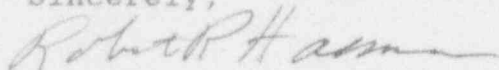
We are now aware that the written directive must be signed and dated by an authorized user prior to administration.

Corrective steps have been taken to assure that all authorized users will sign and date the written directive the day of administration, in addition to the radiotherapy worksheet.

Full compliance was achieved on November 5, 1993 following the NRC inspection.

If there are any other concerns or if any additional information is needed, please feel free to contact me.

Sincerely,



Robert R. Harman, Chief Operating Officer