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OFTALMOLOGO ANTA, GEORGIA  
Enfermedades y Cirugía de los Ojos

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82 JUN 14 A 7: 4<sup>4</sup>

June 4, 1982

John A. Olshinski  
Director  
Div. of Engineering and  
Technical Programs  
U.S. Nuclear Regulatory Commission  
101 Marietta St., N.W.  
Suite 3100  
Atlanta, Georgia 30303

Dear Mr. Olshinski:

In reference to you communication regarding Report # 52-16661-01/82-01, I submit reply for the violations identified during your investigation.

- 1- I admit both accusations, A & B as mentioned in your letter, as I have verbally before.
- 2- The reasons for these violations are as follows:
  - A:
    - 1- I was not aware at the time I was in violation of any law.
    - 2- I had patients scheduled for surgery who needed radiation to prevent recurrence of then superficial eye diseases, and had the benefit of the patients in mind.
    - 3- I had a valid license which just had expired, and thought this was paperwork which was needed in order to comply, but which did not need any other action.
  - B:
    - 1- I was not aware as to violations of any law by not performing leak test.
    - 2- I was not aware of the importance of these leak tests.
    - 3- Since my possession of my license in october 1, 1975 up until September 1981 (6 years) I was

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not contacted by inspectors or by mail as to need for leak testing of my unit. Since laws which are not enforced rarely are complied with, especially by persons whose time is absorbed with its work and whose main worry is the benefit of his patients; I really forgot about this requirement..

4- No information was given to me as to who could do this test and where.

3- Corrective Action:

- 1- Leak test was performed on the unit by Dr. Santiago Gómez, Nuclear Safety officer in P.R. Medical Center, and will be performed by him thereafter every 6 months. He will remind me when the date is due for the leak tests in my unit.
- 2- The unit will be sent for safekeeping to Dra. Carmen Caballero in the Caguas Nuclear Medicine Laboratory, with all the requirements according to the regulations. The unit will be kept there until the license is renewed.

4- Corrective Steps to avoid further violations:

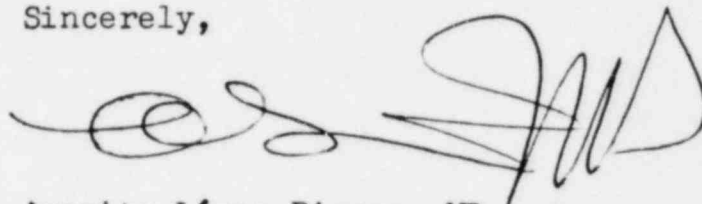
- 1- I will review my license promptly next time.
- 2- Leak tests will be done periodically as stated above.

5- Date when full compliance will be achieved:

- 1- Leak test was done and results were already sent to the nuclear regulatory commission.
- 2- Application for renewal has already been sent to you.
- 3- I am awaiting for response to a letter sent to Washington, D.C. office for waiver of requirement for a course in radioisotope handling, since I have been in possession of the beta radiation unit before that requirement was in effect and my patients cannot benefit from the prevention of recurrence of superficial eye diseases by beta radiation in the meanwhile.

I expect this will answer all the questions you may have.  
If there are any more, don't hesitate to call me or to  
write.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a large, stylized 'R' at the end.

Agapito López Rivera, MD