ST. FRANCIS HEALTH SYSTEM

ST. FRANCIS CENTRAL HOSPITAL

1200 Centre Avenue
Pittsburgh, PA 15219
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January 28, 1994

Docket No. 030-10656
License No. 37-16245-01

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

"REPLY TO A NOTICE OF VIOLATION"

To Whom It May Concern:

During a recent NRC inspection conducted on December 15, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 35.50(c) requires, in part, a licensee to perform appropriate tests for linearity and geometry dependence required by 10 CFR 35.50(b) following adjustments or repair of the dose calibrator.

Contrary to the above, following the adjustment of the dose calibrator on May 20, 1991, the licensee did not perform a test for linearity or geometry dependence.

This is a Severity Level IV violation.

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Written Statement of Explanation:

(1) The reason for the violation:

(A) The Nuclear Medicine Technologists overlooked the requirement of performing the linearity & geometrical variation calculations after the reinstallation of the dose calibrator.
(B) This was not noticed by the Administrative Director of the department or the Radiation Physicist on quarterly reviews.

(2) The corrective steps that have been taken and the results achieved:

(A) The linearity test was performed on May 23, 1991 (attached). The geometrical variation calculation was performed on December 16, 1993 (also attached).
(B) A meeting was held on December 21, 1993 with Radiology Administration and the Nuclear Medicine Technologists to discuss the results of the NRC inspection and what would be done to correct the violation, and to further prevent it's occurrence.
(C) On December 22, 1993, labels (printed in red) were attached to the dose calibrator and the electrical outlet in which the dose calibrator is plugged in, stating the following: "The linearity & geometrical variation calculations MUST be performed at installation, after any repair or adjustment, and any time the dose calibrator is relocated."
(D) On January 20, 1994 the policy for "Testing Procedures of the Dose Calibrator" 17.02/56 (attached) was revised to include the following statements on page 4, Item #6, and on page 5 Item #5:

> Page 4, Item #6:
> Linearity tests will be performed quarterly, after any repair or adjustment, and any time the dose calibrator is relocated....
>
> Page 5, Item #5:
> The geometrical variation calculation MUST be performed at installation, after any repair or adjustment, and any time the dose calibrator is relocated.

(3) The corrective steps that will be taken to avoid further violations:

(A) In revised policy 17.02/56 "Testing Procedures of the Dose Calibrato-" on page 5, it states:

Page 5, Item #5,a:
To further assure that item #5 is completed as required, the Administrative Director must be notified by one of the Nuclear Technologists at the time of installation, all repairs or adjustments, and any relocation of the dose calibrator.

(B) The Radiation Safety Committee will monitor, at each quarterly meeting, that the appropriate testing procedures are performed on the dose calibrator.

(4) The date when full compliance will be achieved:

Full compliance was achieved on January 20, 1994.

Sincerely,

Kenneth Sample
President & CEO

cc: NRC Regional Administrator, Region I