MARTHA'S VINEYARD HOSPITAL

BOX 1477 OAK BLUFFS MASSACHUSETTS 02557 TEL. (617) 693-0410

August 3, 1982

Thomas T. Martin
Director
Division of Engineering &
Technical Programs
Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Docket #30-11991 License #20-16970-01

Dear Mr. Martin:

This letter will serve as a written statement in response to your letter of July 7, 1982, pursuant to the provisions of 10CFR 2.201.

- A. 10CFR 35.14 (b)(4)(ii): Molybdenum 99 contamination to detect and quantify molybdenum 99 breakthrough is now being done daily by personnel specifically trained to perform the test. The results of Molybdenum 99 contamination is recorded daily.
- B. 10CFR 35.14 (e): Leak tests are now being performed on all our calibration sources and reference sources every month and documented. These sources are CS137 and C057.
- C. Item C of Appendix D, Section 2: The dose calibrator is checked daily with CS137 and C057. Both these sources are from 1976. CS137 is a 201 uci source 20ml This reads around 171.0 uci daily on the CS137 setting. The C057 is a 15.1 mci source 20ml This reads around 21.0 uci daily on the C057 setting. These readings are now documented daily. 1976 sources? In September, 1982, will have a known source for Linearity Checks of Dose Calibrator will take readings every so many hours and plot them. Plan to get new sources for calibration.
- 2. Item 14 All packages containing radioactive materials are now opened in accordance with the procedures in Appendix F of Regulatory Guide 10.8. All packages are measured at 3 ft. surface and wipe tests performed and documented. Each week a 100mci generator (molybdenum 99/technitium 99) is received and locked in the "Hot Lab". The Nuclear Medicine technician, before opening the package, measures it at 3 ft. If it measures greater than 10mr/hr, stop the procedure and call the Radiation Safety officer. Also, the surface, if greater than 200mr/hr, stop the procedure and call the Radiation Safety officer. A wipe test is then performed which

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should measure close to background.

Any radioactive package now being received is monitored outside and a wipe test is also performed on the final source as well. All these readings are documented now in Nuclear Medicine.

3. Block 15, Item 2 - Disposable gloves are now being worn by all personnel while handling radioactive materials, also while injecting patients and eluting the generator. Disposable gloves now fit all personnel in Nuclear Medicine.

These are corrective steps taken and the results achieved so are. To avoid further violations, a physicist will come twice a year to check our records and sources, also our Linearity Checks on the Dose Calibrator. Isotope Committee Meetings are now held once a month and documented.

If you have any additional questions, please feel free to call anytime.

Sincerely,

David + Federouse

Executive Director (

CMW/s

cc: Olivia Reeney, R.T., Chief Radiological Technician Peter O'Hara, M.D., Radiologist