

Docket No. 030-03196

License No. 37-13651-01

St. Agnes Medical Center  
ATTN: Thomas J. Kardish, M.D.  
Vice President of Medical Affairs  
1900 South Broad Street  
Philadelphia, Pennsylvania 19145

NOV 24 1993

Dear Mr. Kardish:

SUBJECT: Routine Inspection No. 030-03196/93-001

On October 19, 1993, Mary Cahill of this office conducted a routine safety inspection at the above address of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. In addition, the inspection examined the actions covered in your correspondence dated April 9, 1991, in response to our Confirmatory Action Letter (CAL No. 1-91-001) dated January 18, 1991.

The findings of the inspection were discussed with you and other members of your staff at the conclusion of the inspection. Based on a review of personnel dosimetry reports during the inspection, the inspector noted that a nuclear medicine technologist received relative higher extremity exposures than would be expected. The chief nuclear medicine technologist and the nuclear medicine technologist who received the high extremity exposures informed the inspector that the high exposures were due to the use of a syringe shield which had a missing lead glass window. The inspector was informed that replacement windows had been purchased and observed that intact syringe shields were in use at the time of the inspection. As discussed at the conclusion of the inspection, it is our understanding that you will submit to this office several months of exposure data which reflect the use of intact syringe shields.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed as Appendix A and categorizes each violation by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy). You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

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RETURN ORIGINAL TO  
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The inspector's examination of actions covered in your April 1991 letter indicate that some of your corrective actions were not implemented in the long term. In particular, corrective actions which required that the Radiation Safety Officer review and sign records of inventories and leak tests of sealed sources at specified intervals, had not continued, as identified in Item B of the Notice of Violation. In addition, a commitment identified in the CAL to which you agreed, was to provide radiological safety training to nuclear medicine technologists in applicable NRC license requirements and pertinent regulations. The inspector found that the two nuclear medicine technologists working in the nuclear medicine department at the time of the inspection had not received training in the procedures and conditions of your NRC license since its renewal in June 1992. Failure to train nuclear medicine technologists, as required by 10 CFR 19.12, has been cited as a violation in Item B of the Notice of Violation. The NRC is concerned by your apparent failure to fully comply with the commitments of the CAL and to implement long term corrective actions identified in your April 1991 letter. In your response to this letter, please indicate how you will ensure that corrective actions you have implemented or plan to implement will remain in place over the long term.

Please use the enclosed self-addressed green envelope when you respond to this letter to assist us in the timely processing of your response. In accordance with Section 2.790 of NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room. The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Jenny M. Johansen, Chief  
Medical Inspection Section  
Division of Radiation Safety  
and Safeguards

Enclosure:  
Appendix A, Notice of Violation

St. Agnes Medical Center

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cc:

Public Document Room (PDR)

Nuclear Safety Information Center (NSIC)

Neil Proshan, M.D., Radiation Safety Officer

Commonwealth of Pennsylvania

bcc:

Region I Docket Room (w/concurrences)

D. J. Holody, RI

DRSS:RI

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11/22/93

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