

David Feiglin, ABNM, FACP. President.

Lynn Tezak, RT, RT(NMT). Vice President.

10817 Sperry Rd, Chesterland, OH 44026 (216) 256-8993 Fax (216) 256-8994

12-29-93

B. J. Holt, Chief Nuclear Materials Inspection, Section 1 799 Roosevelt Road Glen Ellyn, Illinois 60137

Reply to Notice of Violation

Dear Mr. Holt:

This refers to the NRC inspection conducted on November 3, 1993 of license No. 34-26454-01.

- 1. A map of the basement floor plan has been submitted to the NRC to add the basement of the 20600 Miles Parkway facility for small animal housing and for I 121 waste storage. The basement is more suitable for that purpose as it is an isolation area and is less travelled. The original ground floor level will be used until the amendment for use of the basement is approved.
- 2. A lock was installed on the isolation room door at 20600 Miles Parkway on November 4, 1993.
- 3. Due to the small number of I 131 therapies performed at 20600 Miles Parkway, the weekly wipe tests during the third and fourth week of October were inadvertantly forgotten. Weekly wipe tests of I 131 storage will be performed as stated in Appendix C of the NRC Regulatory Guide 10.8
- 4. As of November 3, 1993, we will not flush any solid wastes from I 131 feline therapy. All animal waste will be collected and stored for ten half lives or until the radiation levels are the same as background levels.
- 5. The animal carcass that was buried in a pet cemetary had been released to the owner according to the release criteria as specified in our license. The cat expired that evening after she was brought home. The owner requested cremation and brought the cat back to the clinic. We did not think that cremation would be acceptable and we were unsure about burial. Chuck Gioumuso from Universal Consultants contacted the NRC regarding burial.

As a result of the several telephone calls between Mr. Giomuso and the NRC, Mr. Giomuso believed that burial would be allowed. The cat was placed in two plastic bags and transported by truck for burial. The unloading of the truck and burial did not require that the truck driver or anyone else come into contact with any of the animal carcasses in the truck bed. We would like to request that you review this violation. Although this is a rare occurrence, it seems unreasonable and expensive to ask an owner to have their pet's body stored until backgroud radiation levels are reached. We would like to develop a procedure to allow for burial. Since there is no emblaming process and minimum handling is required, we believe that a safe procedure can be implemented. If there are any more contaminated carcasses, we will hold them in storage until we receive your response.

Sincerely,

David Feigrin, M. D. President, RSO

Enclosures:

Letter from Dr. Ron Genovese Letter from Dr. James Preuter



RANDALL VETERINARY HOSPITAL, INC.

EQUINE

DR R L GENOVESE DR K L LONGO

SMALL ANIMAL

DR M.L. CUMMING DR C.J. RADER

12-14-93

Dr. DAVID FEIGLIN M.D. NATIONAL VETERINARY IMAGING 10817 SPERRY RD. CHESTERLAND, DHIO 44026

DEAR DR. FEIGLIN.

THE MANAGEMENT OF THE VETERINARY REFERRAL CLINIC UNDERSTANDS THAT NATIONAL VETERINARY IMAGING (NVI) IS USING RADIOUCLIDES TO PERFORM DIAGNOSTIC AND THERAPEUTIC STUDIES ON ANIMALS ONLY IN THOSE AREAS SPECIFIED IN THE NVI LICENSE.

THE MANAGEMENT OF THE RANDALL VETERINARY HOSPITAL INC. UNDERSTANDS THAT NVI IS RESPONSIBLE FOR THE HEALTH AND SAFETY OF THE CLINIC'S STAFF AND THE PUBLIC. THE CLINIC WILL COOPERATE WITH NVI TO ENSURE THE SAFE USE OF RADIOACTIVE MATERIALS.

FURTHERMORE, THE MANAGEMENT OF THIS CLINIC UNDERSTANDS THAT NVI WILL OFFER DIRECTIVES AS TO THE PROPER MANAGEMENT OF PHYSICAL AREAS WHERE RADIOACTIVE MATERIALS ARE USED AND THESE AREAS MUST BE SECURABLE DUE TO THE STORAGE OF RADIOACTIVE MATERIALS.

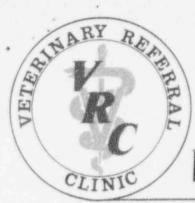
SINCERELY.

RONALD L. GENOVESE V.M.D.

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ADMINISTRATOR, RANDALL VETERINARY HOSPITAL INC.

CC: USNRC B.J. HOLT, CHIEF NUCLEAR MATERIALS INSPECTION SECTION 1



VETERINARY REFERRAL CLINIC

5035 Richmond Road, Cleveland, Ohio 44146 • (216) 831-6789 • Fax (216) 831-4653

December 17, 1993

Dr. David Feiglin, M.D. National Veterinary Imaging 10817 Sperry Road Chesterland, Ohio 44026

Dear Dr. Feiglin:

The management of the Veterinary Referral Clinic understands that National Veterinary Imaging is using radionuclides to perform diagnostic and therapeutic studies on animals only in those areas specified in NVI's license.

The management of this veterinary clinic understands that NVI is responsible for the health and safety of the clinic's staff and the members of the public and that the clinic will cooperate with NVI to ensure the safe use of radioactive materials.

The management of this clinic understands that NVI must have control over areas where radioactive materials are used and must be able to secure areas where radioactive materials are ctored.

Sincerely,

James C. Prueter, DVM Diplomate, ACVIM

Hospital Director

cc: USNRC

B.J. Holt, Chief

Nuclear Materials Inspection

Section 1

JCP/sls