

MEDICAL ARTS BUILDING
SUITE 205-207 • 1010 S. KING STREET
HONOLULU, HAWAII 96814 PHONE 531-6246

REHABILITATION HOSPITAL—2ND FLOOR
226 NO. KUAKINI STREET
HONOLULU, HAWAII 96817 PHONE 523-6417

PHILIP J. W. LEE, M.D., F.A.C.R.

RADIOLOGY • NUCLEAR MEDICINE

MAIN OFFICE
SUITE 101 • 1507 SO. KING STREET
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SUITE 1 • PEARL CITY MEDICAL BUILDING
880 KAMEHAMEHA HIGHWAY
PEARL CITY, HAWAII 96782 PHONE 455-1025

SUITE 102 • CALIFORNIA AVENUE
WAHIAWA, HAWAII 96786
PHONE 622-3939

August 23, 1982

License No. 53-04935-01

R. D. Thomas
Chief, Materials Radiation Protection Section
United States Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Dear Mr. Thomas:

This reply is in compliance with your notice and request dated July 27, 1982

The Enforcement Conference was held on August 5, 1982 with Mr. B. H. Falkenberry, Mr. H. E. Book and I am fully aware of the non-compliance citations discussed. I appreciate the courtesy and very meaningful conversation and discussions that occurred.

The following details are the corrective steps taken with results and avoidance of further items of non-compliance.

A. 10CFR 20.207 (a)

The sealed source containing 50 millicuries of strontium-90 is stored in a utility room, which now is secured with a lock. Access to the room is by key held by my chief technician and myself. A radiation hazard sign is posted on the door.

B. License Condition 13. A

The 6-month requirement for a leak test for the sealed source containing 50 millicuries of strontium was not performed between September 28, 1979 and November 21, 1980 for a period of thirteen months and from June 8, 1981 until March 31, 1982 exceeding nine months.

This was due to my error. Loss of my chief technologist and change over to radiation safety specialist partly contributed to my oversight. We will comply and our next leak test will be performed in September 1982.

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NMS LIC30
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C. License Condition 10.

All nuclear medicine work will be performed at 1507 S. King St., Room 101 commencing September 15, 1982. We are vacating Room 102. We have moved out of Room 206 in January 1980. No work is done at 880 Kam Highway since April 1980. I am now in the process of requesting an amendment to my license.

D. License Condition 18.

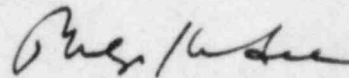
1. Items 1 & 2. Calibration of Instruments and Bioassay for I^{131} . The non-compliance items were an oversight on my part. I have fully discussed these items with my chief technologist and my radiation specialist Mr. Ralph Baltzo of Seattle, Washington. We will perform and record calibrations and bioassays for I^{131} .
2. Item 6. Laboratory Rules for the use of Radioactive Material. The dose calibrator is now employed to assay doses given to patients and is being recorded. We have discussed this matter between my chief technologist and Mr. Ralph Baltzo to prevent and avoid a future non-compliance violation.

E. 10CFR 20.203 (f) (1) (2).

All containers of radioactive material carry labels of "Caution, Radioactive Material" now. The storage room door and inner walls contain signs of "Danger, Radioactive Material".

Thank you for your considerations.

Sincerely,



Philip J. W. Lee, M. D.