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Administration

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August 18, 1982

Mr. John A. Olshinski, Director
Division of Engineering and Technical Programs
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W.
Atlanta, Georgia 30303

30-17084

Re: License No. 10-08389-03

Dear Mr. Olshinski:

In response to the violations of condition 13A and condition 21 specified in License No. 10-08389-03 and cited in Appendix A of your letter dated July 26, 1982, the following procedures have been reinstated:

- A. The 800 microCurie Cesium-137 sealed source used as a calibrated check source has been leak tested and we will continue to leak test it at six month intervals.
- B. Radioactive shipments, in excess of exempt quantities, received by the Nuclear Medicine Service will be surveyed for the presence of contamination.
- C. Radioactive material elution, preparation and injection areas in the Nuclear Medicine Service will be surveyed daily with written records.

Since we feel the Augusta VA Hospital conducts the radiation safety program in accordance with ALARA principles and as efficiently as feasible, the following comments are in order with reference to each of the cited violations and our procedures in effect on July 13, 1982:

- A. The 800 microCurie Cs-137 sealed source has been assayed daily since it was purchased eight years ago. Any discrepancy in the known activity would be more likely observed through this daily documented check than six month leak surveys. The daily visual inspection of this clear epoxy encapsulated source is also more likely to draw attention to loss of source integrity than infrequent leak testing procedures which involve additional exposure to the hands of the surveyor.
- B. The leak testing of small quantity short-lived radioactive shipments which generally demonstrates no significant contamination often leads the technician to the conclusion that the innermost shipping container (not the actual source container)

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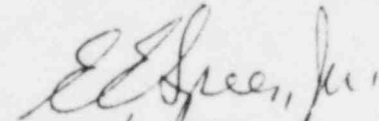
Mr. John A. Olshinski

is contamination free. This false feeling of security encourages handling of the final shipping container without gloves. We prefer treating all short-lived small quantity shipments as potentially contaminated at all times. Any really significant contamination will usually be obvious from the alarm response on the lab background monitor, from the physical condition of the package or from the measured specific activity of first quantity withdrawn for use. Furthermore, leak testing of suspect packages has always been our procedure; leak testing of all packages simply increases exposure to personnel.

- C. Elution and preparation areas are continuously monitored by the background GM monitor. Any significant contamination at the injection sites or on the hands of technicians would be readily observed by the NaI detection equipment used in all patient procedures which involve significant quantities of material. As an independent check on the validity of this approach, weekly wipe surveys are performed in all areas where radioactive contamination might be observed.

Since we are subject to the conditions of our license as is presently constituted we will, as stated above, reinstate its condition. The request for change to a modified version of the procedures in effect during the inspection and as outlined above will be made in conjunction with the next license renewal request.

Sincerely,



EUGENE E. SPEER, JR.
Medical Center Director