

USNRC REGION II
ATLANTA, GEORGIAVeterans
Administration

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September 15, 1982

Mr. John A. Olshinski, Director
Division of Engineering & Technical Programs
Nuclear Regulatory Commission, Region II
101 Marietta St., N.W., Suite 3100
Atlanta, GA 30303



Re: Report No. 10-08389-03/82-01

Dear Mr. Olshinski:

In reference to your letter dated September 8, 1982 and our letter dated August 10, 1982, the following statements will hopefully clarify the information required under the provisions of 10 CFR 2.201.

A. In reference to the violation cited in Item A of your letter dated July 26, 1982:

1. We had changed our procedure as outlined in our license and we were therefore in noncompliance. Before July 13, 1982, the 800 microcurie Cesium-137 source had not been leak tested for two years instead of six months.

2. The reason for the violation was a change in our procedures which was not reflected by an appropriate change in an amendment to our license. For clarity, we repeat paragraph "A" of our letter dated August 10, 1982.

"The 800 microcurie Cs-137 sealed source has been a. sayed 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 involves additional exposure to the hands of the surveyor".

3. As stated in our letter of August 10, 1982, the conditions for leak testing of our Cs-137 800 microcurie source have been reinstated. The source has been leak tested with no external contamination found within the lower limits (≤ 1 nanocurie) of our measurement.

4. We will continue to leak test the source at six month intervals until we can make authorized changes in our license.

5. The leak testing procedure was performed August 9, 1982.

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B. In reference to the violation cited in Item B of your letter dated July 26, 1982:

1. We had changed our procedure as outlined in our license and we were therefore in noncompliance.

2. The reason for the violation was a change in our procedures which was not reflected by an appropriate change in an amendment to our license. For clarity, we repeat paragraph "B" of our letter dated August 10, 1982.

"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) 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".

3. Radioactive shipments, in excess of exempt quantities, received by the Nuclear Medicine Service will be surveyed for the presence of contamination and written records maintained. No contaminated packages have been received. Exposure to the hands of personnel has increased.

4. We will continue to perform external contamination checks on radioactive shipments until we can make authorized changes in our license.

5. Compliance was achieved August 9, 1982.

C. In reference to the violation cited in Item C of your letter dated July 26, 1982:

1. We had changed our procedure as outlined in our license and we were therefore in noncompliance.

2. The reason for the violation was a change in our procedures which was not reflected by an appropriate change in an amendment to our license. For clarity, we repeat paragraph "C" of our letter dated August 10, 1982.

3.

Mr. John A. Olshinski

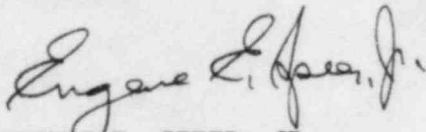
"Elution and preparation areas are continuously monitored by the background GM monitor. Any significant contamination at the injection sites or on the hands of technicians would be readily observed by the NaI detection equipment used in all patient procedures which involve significant quantities of material.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

3. As stated in our letter of August 10, 1982, radioactive material elution, preparation and injection areas in the Nuclear Medicine Service will be surveyed for the presence of contamination daily with written records. To date, no significant contamination has been found that was not readily apparent from our background monitor or from a gamma camera image.

4. We will continue to survey as stated above until we can make authorized changes in our license.

5. Compliance was achieved August 9, 1982.

Sincerely,



EUGENE E. SPEER, JR.
Medical Center Director