



THE
GREENWICH HOSPITAL
ASSOCIATION

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May 10, 1990

Dr. Mohamed Shanbaky, Chief
Nuclear Materials Safety Section A
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

RE: Docket #: 030 01276
Inspection #: 90 001
License No.: 06 09522 01

Dear Dr. Shanbaky:

With reference to your notice of violation dated April 21, 1990,
the information that you request is as follows:

1. **CORRECTIVE ACTIONS:**

No actions will be taken at this time since we do not believe a violation has occurred. As you pointed out, it is required that the Hospital follow the procedures listed in Appendix K of Reg. Guide 10.8, Revision 1 for radiation safety procedures for therapeutic use of radiopharmaceuticals. The section to which you refer states that "... nursing personnel who attend the patient will wear personnel monitoring devices as advised by the radiation safety officer...".

At this institution, we chose not to provide individual personnel monitors to nurses who care for an I 131 patient, but rather to post area monitors within the room. Individual nursing dose could then be calculated by use of a "time in the room" log sheet. Nursing personnel are required to sign in and sign out of the I 131 patient's room listing the time of entry and the time of exit. Once the area monitors are processed, individual dose could then be calculated based upon the dose to the monitor and the nursing time sheets.

Although an I 131 patient's room is a radiation area, as defined by 10 CFR 20.202 (b) (1), film dosimetry is not necessarily required unless the individual "... is likely to receive a dose in any calendar quarter in excess of 25 percent of the applicable value specified in paragraph (a) of 20.101 ..." (10 CFR 20.202 (a) (1).

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Dr. Mohamed Shanbaky
May 10, 1990
Page Two

The value listed as 25 percent of the applicable dose value listed in 10 CFR 20.101 (a) is calculated to be 312 mRem per quarter. Past experience with I 131 therapy at this facility, indicates that this dose value is not attainable. Therefore, film badges are not mandated.

Therefore, the RSO advised that film badges were not required and that our method of calculating nursing dose is an acceptable alternative procedure.

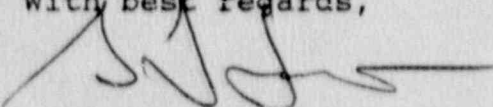
2. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS:

Whenever possible, we will follow the requirements of the NRC to the letter; however, from time to time we reserve the ability to substitute acceptable alternative procedures as recommended by our RSO and consultant in health physics.

3. DATE OF FULL COMPLIANCE:

If you do not accept our alternative method of monitoring exposure as established by our Radiation Safety Officer, please contact me.

With best regards,



Gordon L. Smith
Vice President
Corporate Planning and
Business Development

GLS:dp

cc: Frank A. Corvino
Ralph Sgambato