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THE QUEEN'S MEDICAL CENTER

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1301 Punchbowl Street • Honolulu, Hawaii 96813 • Phone (808) 538-9011 • FAX: (808) 547-4646

March 3, 1994

Docket No. 030-14522
License No. 53-16533-02
EA No. 93-291

USNRC Region V
ATTN: Gregory Yuhas, Chief
Radioactive Materials Safety Branch
1450 Maria Lane
Walnut Creek, CA 94596

Dear Mr. Yuhas:

Please accept the following statements in response to your letter dated February 10, 1994.

1. Only trained nurses shall be assigned to radiopharmaceutical therapy patients. The RSO or Assistant RSO shall provide scheduled training pursuant to 10 CFR 35.310. A self learning module shall be available for untrained nurses who require immediate training. The module will address all topics specified in 10 CFR 35.310.
2. The self learning module for non-nurse care givers will adequately describe the size and appearance of the brachytherapy sources.
3. The self learning module instructs the non-nurse care giver to immediately notify the Radiation Safety Officer to ask questions before entering the therapy patient's room.

Also, there are two revisions to our January 25, 1994 response:

- a. The self learning modules will be kept at the nursing station.
- b. The 19.12 type radiation safety training has not yet been included in the new employee orientation. An informational handout is being developed for future implementation.

You are invited to contact Scott Duhe at (808) 547-4884 if you have any additional questions concerning these matters.

Sincerely,

Karen Muranaka
Vice President, Organizational Services

A Queen's Health Systems Company

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g. p. yuhas



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE
WALNUT CREEK, CALIFORNIA 94596-5368

FEB 10 1994

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Queen's Medical Center
1301 Punchbowl Street
Honolulu, Hawaii 96813

Attention: Karen Muranaka
Vice President, Organizational Services

Ladies and Gentlemen:

Thank you for your letter dated January 25, 1994, informing us of the steps you have taken to correct the items which we brought to your attention in our letter dated December 29, 1993. The implementation of your corrective actions will be verified during our next inspection.

Additional information is needed on your planned corrective actions for Violation A identified in the Notice of Violation dated December 29, 1993. 10 CFR 35.310 requires, in part, that personnel caring for radiopharmaceutical therapy patients be instructed in the procedures for patient control, visitor control, contamination control, waste control, and notification of the Radiation Safety Officer in the event of an emergency. Page 2 of your letter discusses training which will be provided to nurses caring for brachytherapy patients pursuant to 10 CFR 35.410, but does not address training in safety procedures for radiopharmaceutical therapy patients pursuant to 10 CFR 35.310. Furthermore, it is unclear whether the posted self learning module for non-nurse care givers, also discussed on page 2 of your letter, will adequately describe the size and appearance of the brachytherapy sources (10 CFR 35.410(a)(1)) or whether the non-nurse care giver will have an opportunity to ask questions after reading the module and before entry into the therapy patient's room.

You need to submit your response within thirty days of the date transmitting this letter. If you have any questions concerning the information which needs to be provided, contact Troy W. Pruett at (510) 975-0233 or John M. Jacobson at (510) 975-0252.

Sincerely,

G. P. Yuhas

Gregory P. Yuhas, Chief
Radioactive Materials Safety Branch

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