



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

September 3, 1982

License No. 53-09585-01

Winfred Y. Lee, M.D.
Internist Clinic, Inc.
1441 Kapiolani Boulevard
Honolulu, Hawaii 96814

Attention: Winfred Y. Lee, M.D.

Gentlemen:

Thank you for your letter dated August 18, 1982 informing us of the steps you have taken to correct items which we brought to your attention in our letter dated July 21, 1982. Your corrective actions will be verified during our next inspection.

In reviewing your response to Item B, regarding the failure to maintain adequate records of disposal of iodine-131 to the sanitary sewer, we have determined that additional interpretation of the specific requirement pertaining to such disposals will be necessary before we can continue our review of this matter. Consequently, the Region V Office is requesting from the NRC Office of the Executive Legal Director an interpretation of the regulatory requirement for maintaining records of disposal of licensed material contained in human excreta under the circumstances in which the excreta is collected for decay or laboratory analysis prior to discharge of the material to the sanitary sewer pursuant to 10 CFR 20.303(d).

You will receive written notification by the Region V Office of our interpretation of this requirement as it applies to your licensed activities. Until you have received written notification from us regarding this matter, you are requested to maintain all records of disposal of iodine-131 and other licensed material contained in human excreta which is collected in conjunction with thyroid uptake studies.

If you should have any questions concerning this letter, please contact our office at 415-943-3700.

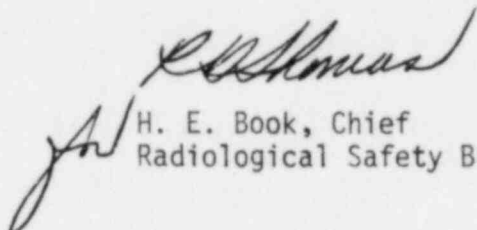
Winfred Y. Lee, M.D.

-2-

September 3, 1982

Your cooperation with us is appreciated.

Sincerely,


H. E. Book, Chief
Radiological Safety Branch

INTERNIST CLINIC INC.

INTERNAL MEDICINE NUCLEAR MEDICINE ENDOCRINOLOGY

WINFRED Y. LEE, M.D., F.A.C.P.

CHEW MUNG LUM, M.D., F.A.C.P.

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August 18, 1982

Mr. George S. Spencer
Director
Division of Technical Inspection
Region V
U.S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 260
Walnut Creek, California 94596-5368

Dear Mr. Spencer:

Re: Response to Notice of Violation dated July 21, 1982 issued to license
No. 53-09585-01

In response to Paragraph 5 of your cover letter, dated July 21, 1982,
the following action has been taken to improve the effectiveness of my
management control system:

1. Ms. Diane Ogasawara, Chief Laboratory Technologist, has been designated as On-site Assistant Radiation Safety Officer. As such, she will ensure that licensed procedures are followed and required activities performed.
2. Internal audits of my radiation safety program will continue.
3. Written responses to any deficiencies noted on future audit reports will be approved and signed off by me.
4. As an additional part of the internal audit process, the auditor will follow-up on the actions taken to correct deficiencies by making a site visit at the appropriate interval after the audit has been conducted to ensure that corrective actions are in force.

The following are corrective actions that have been taken on the specific items noted in your Notice of Violation:

A.1. Areas where radioactive materials are used in quantities greater than 100 microcuries are now being surveyed weekly and will continue to be surveyed weekly. An office and examination room in Suite 1111 is no longer being used for the administration of therapeutic doses of I-131. A final closeout survey of these areas has been made and are on file with our survey records. Full compliance with the item is now in effect.

A.2. Our dose calibrator is now being checked for linearity on a quarterly frequency.

Mr. George S. Spencer
U.S. Nuclear Regulatory Commission

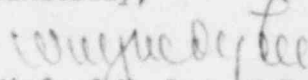
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A.3. The technologist identified during your inspection who works in our radioisotope laboratory has received a one-hour lecture covering basic radiation protection and control as outlined in my initial license application. This initial training was conducted by Mr. Alvin Leong, On-site Radiation Safety Officer for St. Francis Hospital in Honolulu.

B. I-131 in liquid form is not routinely disposed to the sanitary sewer system. However, during the period July 20, 1978 and the date of inspection, July 2, 1982, urine from patients who had been administered 1 millicurie of I-131 for thyroid uptake studies was disposed of. The collected urine was saved and held for decay for several half-lives. Each container of urine was logged in a log book which is maintained in the laboratory, indicating the date it was collected, and the radiation survey performed on the date in which it was disposed of. This record, however, did not contain the quantities in microcuries of radioactivity disposed of after it was held for decay. This log book has been modified to include an entry for each disposal that is made which states the estimated microcuries of I-131 remaining in the urine at the time of disposal. No other source of I-131 is released to the sanitary sewer system. Full compliance with this item is now in effect.

If you have any questions on this matter or concerning this response, please telephone me at (808)946-2157.

Sincerely,


Winfred Y. Lee, M.D.

WYL:es