

To: U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

December 9, 1993

Re: Reply to a Notice of Violation: License # 06-28798-01, Docket # 030-32975
Routine Inspection # 030-32975/93-002

Dear Sir or Madam:

This letter addresses the Notice of Violation that has been received following the inspection of the nuclear cardiology facility of Grove Hill Medical Center, P. C., which we wish to contest.

The license was initially held by Cardiology Consultants of Central CT, P. C., and through a merger of our operations, the license was amended to reflect the general management by Grove Hill Medical Center, P. C. The licensed site address and program, as detailed in the license application, have remained the same and there are no interests outside of nuclear cardiology for the use of radioactive material. Our plans are to use radioactive material at the Winthrop Street office site only.

Grove Hill Medical Center, P. C., is a professional corporation of licensed physicians with a single taxpayer identification number. Each physician is a partner and a Vice President of the corporation. This is a multi specialty, ambulatory care practice with the patient population seen on a visiting outpatient basis. The State of Connecticut classifies our P. C. as a clinic, not a "medical institution" which your regulations provide a very broad definition of.

Our working environment is structured more like that of a private practice office than of a medical institution. For example, we have nurses but no Nursing Department, and the Radiation Safety Committee requirement to have a representative from nursing appears to be a poor requirement in our case. After all, the nurse's background experience should be of some relevance in selecting that representative. And the management member may also be a committee member that is inexperienced in radiation science and regulatory affairs.

It is evident that the Radiation Safety Committee has many functions and responsibilities over the radiation safety program. For those reasons alone an unknowledgeable, though well intended, layer of bureaucracy overseeing a single site using radioactive material does not appear justified.

Summarizing then, we request not to be considered a "medical institution" and to be exempt from the requirement for a Radiation Safety Committee. The activities of the proposed committee are being handled adequately by Dr., Jan R. Paris, the single

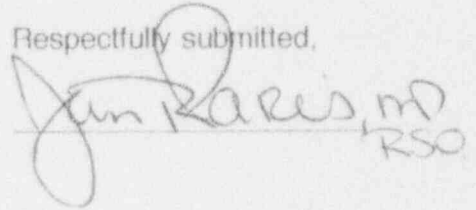
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authorized user and Radiation Safety Officer. His direction provided the Winthrop Street site with a faultless inspection, until the extent of our services were questioned under the "medical institution" definition.

The Winthrop Street site, of what had been Cardiology Consultants of Central CT, is the only site of Grove Hill Medical Center, P. C., that is designated for the use of radioactive material. If I can be of any further assistance, please do not hesitate to contact me, or, Dr. Jan Paris.

Respectfully submitted,

Handwritten signature of Jan Paris, MD, RSO. The signature is written in cursive and includes the initials "MD" and "RSO" to the right of the name.

cc: Regional Administrator, Region I, 475 Allendale Road, King of Prussia, PA 19406