

Inspection  
F/U: 4/4/88

MAR 03 1988

Docket No. 030-12483  
License No. 52-17273-01

Caguas Sono-Nuclear and Vascular Center  
ATTN: Carmen Cabellero, M.D.  
P. O. Box 6960  
Caguas, PR 00626

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 52-17273-01/87-01

Thank you for your response of January 20, 1988, to our Notice of Violation issued on December 21, 1987, concerning activities conducted at your Caguas facility under NRC License No. 52-17273-01. We have evaluated your response to Violations A.3 and 4, C, F and G and found that they meet the requirements of 10 CFR 2.201. We will examine the implementation of those corrective actions during subsequent inspections.

After reviewing your response to Violation A.1, we agree that this item did not constitute a violation. Unfortunately, the information for 1985 and 1986 was not available during the inspection.

After reviewing your response to Violation H, we agree that the Form NRC-3 was posted in the hot lab, but there was no notice of where the other required documents may be examined as required by 10 CFR 19.11(b). Therefore, Violation H remains, as clarified.

After careful review of your denial or partial denial to Violations A.2, B, D, and E, we conclude that the violations did occur as stated and as further indicated below.

1. Violation A.2 alleged that during the 4th quarter of 1985 and during the 3rd and 4th quarters of 1986, linearity tests on the dose calibrator were not performed. The records of linearity checks performed in 1987, as cited in your response, are not relevant to the violation as stated nor is your response in accordance with 10 CFR 2.201.
2. Violation B alleged that during the inspection, licensee representatives Dr. J. Scott-Cora and G. Alejandro stated that they knew of no written procedures for receiving and opening packages of byproduct material safely nor for the safe use of byproduct material. However, you stated in your response that you do have these procedures. 10 CFR 35.21(b)(2) also states that these procedures will be implemented. However, it was obvious from interviewing the licensee representatives that these procedures were not implemented.

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3. As stated in Violation D, during the 3rd quarter of 1987 a physical inventory of all sealed sources possessed was not performed. The performance of a physical inventory during the 4th quarter of 1987, as cited in your response, is not relevant to the violation as stated nor is your response in accordance with 10 CFR 2.201.
4. With respect to Violation E, during the inspection the licensee could not provide the inspector a written ALARA program description, nor were the licensee representatives interviewed aware that any such program had been implemented; therefore, the violation remains as stated.

In order to prevent further enforcement actions, you must provide a supplemental response to Violations A.2, B, D, E, and H within 30 days, committing to adequate corrective actions.

We appreciate your cooperation in this matter.

Sincerely,

J. Philip Stohr, Director  
Division of Radiation Safety  
and Safeguards

bcc: Document Control Desk  
Commonwealth of PR  
G. Sjoblom, IMNS

RII  
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PEllicht  
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