



UNIVERSIDAD DE PUERTO RICO. RECINTO DE CIENCIAS MEDICAS
UNIVERSITY OF PUERTO RICO. MEDICAL SCIENCES CAMPUS

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OFICINA DEL RECTOR
OFFICE OF THE CHANCELLOR

July 20, 1989

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

RE: Notice of Violations
Lic. Num. 52-01946-07/08

Gentlemen:

Enclosed please find the document Reply to a Notice of Violations for the University of Puerto Rico Medical Sciences Campus. If further details are required, please contact us.

Sincerely,

Angel Roman Franco, M.D.
Acting Chancellor

Enclosures: Reply to a Notice of Violations

cc/Enclosures: NRC Regional Administrator, Region II

-(8907250111) XA

University of Puerto Rico
Medical Sciences Campus

Reply to a Notice of Violation

License No. 52-01946-07

A.

1. Violation is admitted
2. The previous RSO did not performed the required monitoring.
3. Effective April, 1989, the new appointed RSO has been performing the monitoring of all Medical Sciences Labs. on a monthly basis using a G-M survey meter. Records are maintained for NRC review.
4. The Radiation Safety Program has been reorganized with a new RSO and 2 full time technicians. This will permit this program do operate more efficiently and avoid further violations of this type.
5. Full compliance has already being achieved.

B.

1. Violations is admitted, although we can assure that it was an extremely exception to the usual safety practice in the hot room.
2. The reason for this violation is very difficult to identify, because of the safety concern of all personnel working in that area.
3. Corrective steps: oral orientation given to personnel in the hot lab. about the requirements of not leaving this area unattended. A memorandum prepared by the Nuclear Medicine Director and RSO to all Nuclear Medicine personnel urging to comply with this requirement.
4. Close supervision of the hot lab. by the RSO, and continuous orientation to all people working in that area will prevent future violations.
5. Full compliance already achieved.

C.

1. Violation is admitted since we were unable to show records.
2. For unknown reason, the records for the period of June 28, 1988 through April 11, 1989 were missed.
3. Corrective steps: the Director of Nuclear Medicine and the RSO, instructed the technologists about this requirement. Now, all person handling more than 1 mCi of radioidine shall have a thyroid measurement and records of these uptakes will be maintained.
4. To avoid further violations, the RSO will supervise these measurements periodically jointly with the Director of Nuclear Medicine.
5. Full compliance is already achieved.

D.

1. If it is stated in our License that the GM instruments in Nuclear Medicine is calibrated twice a year, violations is admitted.
2. According with 10 CFR 35.51 (a), survey meters are required to be calibrated after repair and annually. For that reason, it was calibrated on an annual basis.
3. The corrective step: Instrument calibrated according with the pointed out requirement.
4. To avoid further violations, an ammendment to the License will be applied for to calibrate it according with 10 CFR 35.51 (a).
5. Full compliance will be achieved when the ammendment is approved by NRC.

License No. 52-01946-08

E.

1. Violation is admitted since Dr. Figueroa is not listed in the License nor she is Board certified as required by 10 CFR 35.3 (b).
2. The reason for the violation was that it was though that with the approval of Dr. Nayda Figueroa by the Radiation Safety Committee we were in compliance with NRC regulations.

She was approved by the RSC but an amendment to the License to include her as authorized user was never done.

3. Corrective step: Dr. Nayda Figueroa and Dr. Marcial, Director of Radiotherapy were instructed about this violation and she will not use licensed material until approved by NRC.
4. To avoid further violations, an amendment to the teletherapy license will be applied for including Dr. N. Figueroa as authorized user.
5. Full compliance will be achieved when the amendment be approved. It will be submitted to NRC by July 31, 1989.

F.

1. Violation is admitted.
2. After the repair, an output for a 10 X 10 cm. field was measured and found without change. For that reason, a full calibration was not performed as required by 10 CFR 35.632 (a)(2) (iii).
3. No special corrective actions were taken at that time. A full calibrations was performed on June 9, 1987.
4. The violations was discussed with Dr. Marcial, Director of Radiotherapy, with Cecilia Ramirez, assistant physicist and with Dr. Heriberto Torres, Radiation Safety Officer and recently appointed radiotherapy physicist. For the future, whenever there is a repair of the teletherapy unit, a full calibration will be performed before returned to service and treatment of patients.
5. Full compliance is already achieved.

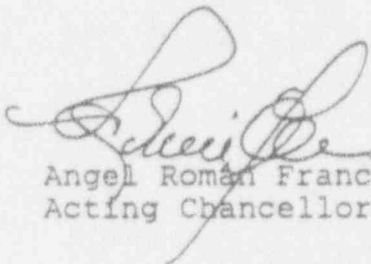
G.

1. Violation is admitted.
2. Miss Cecilia Ramirez, the Assistant Physicist in the Radiation Oncology Division has 20 years experience in radiotherapy physics. She has been doing full calibrations under the supervision, first of Dr. E.T. Agord, then of Mr. Jose C. Pacheco and later of Doctor. H. Torres. We considered that she was qualified to do this job.

3. Corrective steps: the teletherapy License was amended to include Dr. Heriberto Torres as the teletherapy physicist. His credentials were reviewed by NRC (Mr. Earl G. Wright) and accepted. In addition to this, a petition for exception to regulations of Miss Cecilia Ramirez is under consideration of NRC Headquarters in Washington, D. C. Dr. Torres is now in charge of performing full calibrations and reviewing all monthly spot checks.

H.

1. Violations is admitted.
2. See G-2
3. (See G-3) Dr. Torres will also review all spot checks.
4. See G-3
5. Compliance already achieved.



Angel Roman Franco, MD
Acting Chancellor

July 19, 1989

HT/mcg