



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

OFICINA DEL RECTOR
OFFICE OF THE CHANCELLOR

December 18, 1989

Dockets - 30-13584
30-14810

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn. Document Control Desk

Reply to a Notice of Violation
Lics. 52-01946-07 and 52-01946-8

- A
- 1) Violation is admitted (with some observations).
 - 2) The RSO was in the position for only one month when the incident occurred and for many reasons outside of his control the situation was not managed completely according with established procedures. The RSO was not called neither by the nurse supervisor nor by the radiotherapy technician immediately after the incident (even when the RSO is provided with a beeper). When the RSO was called (about 10:00 a.m.) he arrived immediately to the hospital. He interviewed the nurses and patient and performed area and patient surveys. The sources were already back in the safety cabinet. It was estimated that the patient and nurses did not receive a dose in excess of that expected under normal conditions.
 - 3) Corrective steps
 - 1) The safety procedures to be followed at the Oncology Section of the University Hospital were reviewed with nurses.
 - 2) The health physics technicians were instructed also about following the procedures.
 - 3) To call the RSO immediately and let him be in charge of the situation.
 - 4) The physicians were also instructed about the safety procedures.
 - 5) The RSO will perform a careful evaluation of situations like this if they occur again.

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- 4) See item 3.
- 5) Date of full compliance
We are already in compliance.

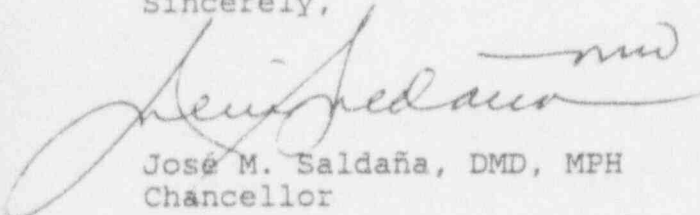
- B
- 1) Violation is admitted
 - 2) Reason for violation

This violations was also notified in Notice of Violations of June 14, 1989 and received on Campus June 30, 1989. By that time the June 9, 1989 calibration was already performed by Ms. Cecilia Ramirez, assistant radiotherapy physicist. During the visit of Ms. Waldrom on August 29, 1989 she found this calibration in the records. Dr. H. Torres was appointed radiotherapy physicist, May 22, 1989. We assumed that since this full calibration was already performed it was accepted because the physicist was named after that date.

- 3) Corrective steps
 - 1) A full calibration will be performed by the radiotherapy physicist
 - 2) This full calibration will substitute the one performed by Ms. Cecilia Ramirez on June 9, 1989.
 - 4) From now on all full calibrations will be performed by the radiotherapy physicist according with regulation.
 - 5) Date of full compliance
June 31, 1990.

Should you have further questions concerning that reply please contact us.

Sincerely,



José M. Saldaña, DMD, MPH
Chancellor