



Nuclear Medicine Laboratory

HOSPITAL MATILDE BRENES

Frieda Silva de Roldán, M.D., Medical Director

Urb. Hnas. Dávila, Bayamón, P.R.

March 16, 1990

U.S. Nuclear Regulatory Commission
Washington, D.C.
1115 Massachusetts St. N.W.
Atlanta Georgia, 30318

Re: Lic. 32-19112-01
CERCLA 32-19112-01

Dear Sir:

This is in reply to your letter dated March 7, 1990, concerning the Notice of Violation of NRC requirements identified during the last safety inspection conducted on February 9, 1990:

VIOLATIONS N.1 and N.2

Violations are partially admitted, due to the fact that several statements and representations contained in the application dated June 10, 1979 do not represent our current Radiation Protection Program:

- 1. Training to personnel required by 10 CFR 35 and part 19 is provided as stated in Append. 12 to this letter
- 2. Sealing material and empty packages have been monitored with a detection detection survey meter before disposal to the general garbage, but results have not been recorded in the forms (NRC-11) suggested in the Regulatory Guide 10.1 (August, 1987) page NRC-12. Using attached NRC Form 32 full compliance will be achieved for April 1, 1990.

The Nuclear Medicine facility at the Hospital relinquished activities last September 3, 1989 and its NRC license has been changed and amended by the document dated November 1, 1989 and the letter dated February 1, 1990 were amended. (See attached 10.1) so please supersede with conditions 10 of the license, letters and attachments dated Sept. 1, 1979, May 1, 1980, July 1, 1981 and which do not represent our current activities.

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REG-2 Lic 30
32-19112-01 FBC

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ANNEX IA

TRAINING REQUIRED BY PERSONNEL

1. Nuclear Medicine Physicians
2. Radiation Safety Officer (RSO)
3. Radiation Physics Consultant (RPC)
4. Nuclear Medicine Technologist
5. All other personnel

RESUME FOR ANDREW WOODS WORKING IN OR FREQUENTLY VISITING
RESIDENCE ADDRESS:

Medical Background - Civilian Work:

Any human use of hypodermic needles must be limited
by our under the supervision of a physician as defined
in 10 CFR-35.11. Subpart J of the Nuclear Regulatory
Commission revised 10 CFR Part 35 outlines the training
and experience that the Commission has found acceptable
for physicians who will handle hypodermic needles for
human use, listed in section 35.1100.35.100.35.100.35.100.

REGISTRATION REQUIREMENTS - PHYSICIAN:

That under the Regulations and Executive Order, Section
is provided in 10 CFR, Part 35, Subpart J, 35.1100 and 35.1101.

REGISTRATION PHYSICIAN CONSENT - PPT:

shall have the following minimum training and experience:

- 3.1 A Master of Science Degree in Public Health,
Physiology, Radiological Health or Health
Physics.
- 3.2 One Year of full-time training in Nuclear
Medicine Laboratories.
- 3.3 One Year of full-time experience in an
institution with Nuclear Medicine facilities
including the use of radiologic services and
equipment calibration.

Medical Background - Federal Government:

- 4.1 That I have a formal training in Nuclear
Medicine, Nuclear Technology and Health
Physics with associated radiologic services and
equipment calibration. My previous
experience are well documented.

That I have a working knowledge of the rules and
regulations governing the use of radioactive
materials and the use of radiologic services and
equipment calibration.

MBH-Form 03

PACKAGE RECEIPT AND MONITOR LOG

Date Received	Purchase Order No	mCi	iso	Chemical	Supplier	Pkg ok?	mR/m surf	Wipe * out in T.I.	Notes	Init.

* REQUIRED WHEN PACKAGE CONDITIONS LOOK SUSPICIOUS, I.E. PUNCTURED, STAINS, WET, CRUSHED... ETC.
PACKING MATERIAL (for Disposal) _____ mR/hr over Bgd.limits
 (See Notes)