

yellow

August 13, 1982

Mr. Donald Hughes, Manager  
Radiation Control Branch  
275 East Main Street  
Frankfort, KY 40621

Dear Mr. Hughes:

This is in response to the questions you raised in your letter of June 9, 1982, following our 1982 review of the Kentucky radiation control program.

With regard to the questions raised in response to our comments on Licensing, paragraphs B.1 and B.5, it is our policy, and the reviewer's objective to communicate constructive comments to your staff as they are developed during the review, that they be summarized during the exit meeting, and the details also provided to you in the final report. The report has not been finalized at this time; however, to assure that all of our comments have been communicated to you and your staff, a copy of the comments regarding the "Review of Selected License Files" has been included as Enclosure 1. All of the licensing comments were relatively minor.

In reference to the question raised concerning our comment on Compliance, paragraph A.2, the time required to issue an enforcement letter ranged from 25 to 30 days in four out of the fourteen files reviewed. The comment was intended to be constructive and as a precautionary reminder to the state of the 30 day requirement. A copy of the comments regarding the "Review of Selected Compliance Files" has been included for your information as Enclosure 2. It should be noted that the comments were also relatively minor in significance.

If you have any further questions, please feel free to contact me at any time.

Sincerely,

(Original signed by RLWoodruff)

Richard L. Woodruff  
State Agreements Representative

Enclosures:

1. Review of Selected License Files
2. Review of Selected Compliance Files

cc w/encl:  
See Page 2

8210010100 820813  
PDR STPRG ESGKY  
PDR

IE31

Mr. Donald Hughes

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August 13, 1982

cc w/encl:  
G. Wayne Kerr, Director  
Office of State Programs, NRC

bcc w/encl:  
D. A. Nussbaumer, Assistant Director  
for State Agreements Program  
Office of State Programs, NRC  
Document Management Branch  
State of Kentucky

RII *AW*  
RLWoodruff:ht  
8/1/82

RII *AB*  
*Col* JA01shinski  
8/2/82

SA *AW*  
*for* DANussbaumer  
8/10/82  
*by telecon*

## ENCLOSURE 1

### REVIEW OF SELECTED LICENSE FILES

#### Summary and Conclusions

A review was conducted of 14 license files. The files were reviewed in general for significant errors, omissions, deficiencies in the licensing actions, properly completed applications, appropriate signatures, and to determine if the licenses were properly supported by information in the file.

Cover letters are utilized to transmit renewal notices and license documents. In general, the reviewer found that the licenses contained appropriate licensing conditions for the type of license being issued, and the reviews covered pertinent points of acceptable radiation programs; however, in some cases, detailed information was lacking. Specifics are listed in the chart at the end of this Appendix. Licensing guides for the more frequently used applications should be developed and made available to applicants on a routine basis when they are renewed in their entirety. The license files should be arranged so that each license folder has a copy of the current license and amendments and the corresponding back-up materials filed together but separated from the general correspondence section and separated from the inspection reports/compliance section of the folder. Superseded license materials should be clearly identified and separated from the current information in the license folder.

#### Licenses Reviewed

The following licenses were reviewed and for the purposes of this report, a numerical code was assigned to each license as follows:

1. Company: Texas Gas Transmission Corporation  
Address: 3800 Frederica Street  
P. O. Box 1160  
Owensboro, KY 42302  
License Number: IND-46-50 Amendment No. 8  
Issued: 2/10/82  
Expires: 11/30/82  
License Type: Gas Chromatograph
  
2. Company: University of Kentucky  
Address: Medical Center - Radiology Department  
800 Rose Street  
Lexington, KY  
License Number: NMD-24-31 Amendment No. 12  
Issued: 5/29/81  
Expires: 9/30/82  
License Type: Medical, Teletherapy

3. Company: Foster Wheeler Energy Corporation  
Address: P. O. Box 254  
Centertown, KY 42328  
License Number: IND-262-05 New License  
Issued: 2/16/82  
Expires: 2/28/83  
License Type: Radiography
4. Company: Lourdes Hospital  
Address: 1530 Lone Oak Road  
Paducah, KY 42001  
License Number: NMD-149-25  
Issued: 5/11/81  
Expires: 5/30/82  
License Type: Nuclear Medicine -  
Groups I, II, III
5. Company: University of Kentucky  
Address: 800 Rose Street  
Lexington, KY 40506  
License Number: ACA-21-72 Amendment No. 28  
Issued: 1/28/82  
Expires: 5/31/83  
License Type: Broad Academic
6. Company: Woodford Memorial Hospital  
Address: 360 Amsden Avenue  
Versailles, KY 40383  
License Number: NMD-153-24 New License  
Issued: 10/30/81  
Expires: 10/31/82  
License Type: Medical - Groups II, II, III
7. Company: Nuclear Pharmacy, Incorporated  
Address: 832 South Sixth Street  
Louisville, KY 40203  
License Number: IND-206-32 Amendment No. 17  
Issued: 2/24/82  
Expires: 6/30/83  
License Type: Nuclear Pharmacy
8. Company: Jennie Stuart Memorial Hospital  
Address: Hospital Lane  
Hopkinsville, KY 42240  
License Number: NMD-122-31 Amendment No. 2  
Issued: 8/19/81  
Expires: 3/31/82  
License Type: Teletherapy

9. Company: St. Joseph Hospital  
Address: 1400 Harrodsburg Road  
Lexington, KY 40504  
License Number: SNM-17-04 Amendment No. 4  
Issued: 8/26/81  
Expires: 9/30/82  
License Type: SNM, Pacemakers
10. Company: University of Kentucky  
Address: Medical Center  
800 Rose Street  
Lexington, KY 40506  
License Number: SNM-16-83 Amendment No. 4  
Issued: 8/26/81  
Expires: 9/30/82  
License Type: Pacemaker
11. Company: Jewish Hospital  
Address: 217 East Chestnut Street  
Louisville, KY 40202  
License Number: NMD-115-22 Amendment No. 2  
Issued: 10/30/81  
Expires: 6/30/83  
License Type: Broad Medical
12. Company: University of Kentucky Medical Center  
Address: 800 Rose Street  
Lexington, KY 40506  
License Number: NMD-49-22 Amendment No. 12  
Issued: 1/28/82  
Expires: 5/31/83  
License Type: Broad Medical
13. Company: Ronan Engineering Company  
Address: 8050 Production Drive  
Florence, KY 41042  
License Number: IND-267-95(G) New License  
Issued: 2/23/82  
Expires: 2/28/83  
License Type: Industrial
14. Company: Ronan Engineering Company  
Address: 8050 Production Drive  
Florence, KY 41042  
License Number: IND-260-95 New License  
Issued: 9/3/81  
Expires: 9/30/82  
License Type: Industrial

The following table lists specific compliance comments developed during the review for each of the above numerically coded compliance files.

<u>Specific Comments</u>	<u>License Codes</u>
a) License applications and supporting information should be updated upon license renewal in "entirety"	1, 2, 5, 7, 12
b) Some of the license backup information was either missing or could not be located in files (application, correspondence, or procedures)	1, 7, 12, 14
c) Additional information needed on disposal and leak testing of sealed sources	1
d) Additional information needed on radiation surveys performed, or frequency of surveys	2, 4
e) Additional information needed on training of radiographers	3
f) Previous (private user) license at this facility should be referenced	4
g) Molybdenum-99 breakthrough test should be maintained by licensee for three years	4, 7
h) Additional information needed on calibration of dose calibrator and QA test performed	4, 11
i) Additional information needed on therapy procedure	4
j) Additional information needed on survey instruments used	6
k) Additional information needed on spotcheck measurements and instruments used	8
l) Licensing condition regarding air transportation is not needed	9, 10
m) Materials for human use shall be used only by a physician approved by the isotope committee	10, 12
n) Tie down condition lists wrong date of application	13

ENCLOSURE 2  
REVIEW OF SELECTED COMPLIANCE FILES

Summary and Conclusion

The state uses two types of field inspection forms, one medical, and one for radiographic inspections. These forms are more "narrative" types as compared with "check list" types. In general, the files were reviewed to determine if the inspections were complete and substantiated all items of noncompliance and recommendations. The files were reviewed to determine if appropriate enforcement actions were taken, written in appropriate regulatory language, timeliness of letters, if adequate responses were received from the licensee to close out the enforcement actions, and if the reports were sufficiently detailed to document if the licensee's program was sufficient to comply with the rules and regulations and to protect public health and safety.

In general, the quality of the inspection reports have improved over the years; however, in some cases, additional details and documentation is needed as outlined in the summary table that follows. The reviewer found it difficult to review the folders in some cases because the inspection reports and enforcement actions had not been kept separate from the license back-up materials and general correspondence. In some cases, additional information was needed to document: (a) the scope of the licensee's program, (b) internal audits performed by radiography licensees, (c) QA test performed on dose calibrators, (d) the use of protective equipment such as syringe shields, and (e) the various types of surveys required by the licensee.

Fourteen license compliance files were selected for review. For purposes of this report, a numerical code (1 through 14) was assigned to the compliance files in the following list.

Compliance Files Reviewed

1. Company:	Norton's Childrens Hospital	License Number:	NMD-34-25
Address:	Louisville, KY	License Type:	Medical
	Louisville, KY 40258	Date of Inspection:	2/26/82
Type of Report:	Narrative	Type of Inspection:	Complete
Inspector:	Charles Coleman		Reinspection
			Unannounced
Report Reviewed By:	Roy Osborne on 3/22/82		
Enforcement Letter:	Noncompliance dated 3/15/82		
Signed By:	Roy Osborne		
Date of Licensee Response:	3/27/82		
Date of State Acknowledgement:	3/31/82		

2. Company: Ohio Valley X-Ray Service License Number: IND-132-05  
 Address: 8808 Hagner Way License Type: Radiography  
 Louisville, KY 40258 Date of Inspection: 5/12/81  
 Type of Inspection: Complete  
 Type of Report: Narrative Reinspection  
 Inspectors: Charles Coleman Unannounced  
 Stephen Howard

Report Reviewed By: Roy Osborne on 6/15/81

Enforcement Letter: Noncompliance dated 6/12/81

Signed By: Roy Osborne

Date of Licensee Response: 6/17/81

Date of State Acknowledgement: 6/29/81

3. Company: Kings Daughter's Hospital License Number: NMD-66-26  
 Address: Ashland, KY License Type: Medical  
 Date of Inspection: 12/9/81  
 Type of Inspection: Complete  
 Type of Report: Narrative Reinspection  
 Inspector: Charles Coleman Unannounced  
 Report Reviewed By: (Undetermined) on 12/29/81

Enforcement Letter: Noncompliance dated 12/29/81

Signed By: Roy Osborne

Date of Licensee Response: 1/13/82

Date of State Acknowledgement: 1/19/82

4. Company: Lexington Clinic License Number: NMD-61-25  
 Address: 1221 South Broadway License Type: Medical  
 Lexington, KY 40504 Date of Inspection: 2/5/82  
 Type of Inspection: Complete  
 Type of Report: Narrative Reinspection  
 Inspector: Charles Coleman Unannounced

Report Reviewed By: Roy Osborne on 2/19/82

Enforcement Letter: Noncompliance dated 2/19/82

Signed By: Roy Osborne

Date of Licensee Response: 2/23/82

Date of State Acknowledgement: 3/24/82



5. Company: Henry Vogt Machine Co. License Number: IND-74-05  
 Address: Louisville, KY 40201 License Type: Radiography  
 Date of Inspection: 12/14/81  
 Type of Inspection: Complete  
 Type of Report: Narrative Reinspection  
 Inspector: Roy Osborne Unannounced  
 Report Reviewed By: Undetermined  
 Enforcement Letter: Noncompliance dated 12/21/81  
 Signed By: Roy Osborne  
 Date of Licensee Response: 1/21/81  
 Date of State Acknowledgement: 1/21/81
6. Company: AMCA Coal Leasing License Number: IND-224-40  
 Address: Madisonville, KY License Type: Well Logger  
 Date of Inspection: 5/6/81  
 Type of Inspection: Complete  
 Type of Report: Narrative Initial  
 Inspector: Charles Coleman Unannounced  
 Report Reviewed By: Roy Osborne on 6/2/81  
 Enforcement Letter: Noncompliance dated 6/1/81  
 Signed By: Roy Osborne  
 Date of Licensee Response: 6/5/81  
 Date of State Acknowledgement: 6/12/81
7. Company: Tennessee Gas Pipeline License Number: IND-196-05  
 Address: P. O. Box 577 License Type: Radiography -  
 Winchester, KY 40391 field  
 Date of Inspection: 3/15/82  
 Type of Inspection: Complete  
 Type of Report: Narrative Reinspection  
 Inspector: Charles Coleman Announced  
 Report Reviewed By: Roy Osborne on 3/24/82  
 Enforcement Letter: Noncompliance dated 3/25/82  
 Signed By: Roy Osborne  
 Date of Licensee Response: Undetermined  
 Date of State Acknowledgement: Undetermined

8. Company: Jewish Hospital  
 Address: 217 East Chestnut St.  
 Louisville, KY 40202  
 License Number: NMD-115-22  
 License Type: Medical  
 Date of Inspection: 6/24/81  
 Type of Inspection: Complete  
 Reinspection  
 Announced  
 Type of Report: Narrative  
 Inspectors: Roy Osborne  
 Charles Coleman  
 Report Reviewed By: Roy Osborne on 7/13/81  
 Enforcement Letter: Noncompliance dated 7/13/81  
 Signed By: Roy Osborne  
 Date of Licensee Response: 7/21 & 28/81  
 Date of State Acknowledgement: 7/31/81
9. Company: Hardin Memorial Hospital  
 Address: West Dixie Highway  
 Elizabethtown, KY 42701  
 License Number: NMD-148-25  
 License Type: Medical  
 Date of Inspection: 3/4/82  
 Type of Inspection: Complete  
 Initial  
 Unannounced  
 Type of Report: Narrative  
 Inspector: Roy Osborne  
 Report Reviewed By: Roy Osborne on 3/24/82  
 Enforcement Letter: Noncompliance dated 3/24/82  
 Signed By: Roy Osborne  
 Date of Licensee Response: 4/8/82  
 Date of State Acknowledgement: 4/15/82
10. Company: Hayes Testing Laboratory  
 Address: 3934 Dixie Highway  
 Suite 410  
 Louisville, KY 40216  
 License Number: IND-168-05  
 License Type: Radiography -  
 Field  
 Date of Inspection: 12/9/81  
 Type of Inspection: Complete  
 Reinspection  
 Unannounced  
 Type of Report: Narrative  
 Inspector: Roy Osborne  
 Report Reviewed By: Roy Osborne on 12/17/81  
 Enforcement Letter: Noncompliance dated 12/17/81  
 Signed By: Roy Osborne  
 Date of Licensee Response: 1/15/82  
 Date of State Acknowledgement: 1/21/82



13. Company: University of Louisville License Number: ACA-34-71  
 Address: 2301 S. Third Street License Type: Academic - Broad  
 Louisville, KY 40208 Date of Inspection: 8/26 & 27/81  
 Type of Report: Narrative Type of Inspection: Complete  
 Inspectors: Roy Osborne Reinspection  
 Charles Coleman Announced

Report Reviewed By: Roy Osborne on 9/15/81

Enforcement Letter: Noncompliance dated 9/11/81

Signed By: Roy Osborne

Date of Licensee Response: 10/19/81

Date of State Acknowledgement: 10/26/81

14. Company: Regional Medical Ctr. License Number: NMD-141-25  
 Address: Hospital Drive License Type: Medical  
 Madisonville, KY 42431 Date of Inspection: 5/5/81  
 Type of Report: Narrative Type of Inspection: Complete  
 Inspector: Charles Coleman Initial  
 Announced

Report Reviewed By: Roy Osborne on 6/5/81

Enforcement Letter: Noncompliance dated 6/4/81

Signed By: Roy Osborne

Date of Licensee Response: 6/26/81

Date of State Acknowledgement: 7/7/81

Summary Table

The following table lists specific compliance comments developed during the review for each of the above numerically coded compliance files.

<u>Specific Comments</u>	<u>License Code</u>
a. Additional information needed on ALARA program	1, 3, 8, 9, 12, 14
b. Repeat violations not identified as such	2,
c. Need additional information on exit interview conducted	2,
d. Additional information needed on film badge exposure	2,
e. Additional information needed on independent measurements conducted	2,
f. More information needed on vehicle	2,
g. More information needed on posting and labeling	2,
h. Use of subjective term "not adequate" to describe inspection findings	2,
i. Inspection report not documented as being reviewed by supervision	3, 5, 9, 10, 12
j. License, backup materials, correspondence, and report not separated in file folder	3, 4,
k. Reports should identify items of noncompliance with the regulation or license condition number	3,
l. Additional information needed on isotope committee membership and duties	3,
m. Additional information needed on survey instruments used by licensee and calibration thereof	3,
n. Delay between inspection and letter to licensee ranged from 25 to 30 days (precautionary comment)	2, 6, 11, 14