



November 16, 1990

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

Attn: Document Control Desk

Reference:
Docket No.030-14323/0-01
License No. 35-01164-02

Dear Sirs:

This letter is in regards to your request for a written response to the three violations (Severity Level IV) found during the N.R.C. inspection conducted September 20, 1990.

- A. Failure to post the calculated time and safety measures to be instituted in the case of a spill of Xenon-133 at the area of use.
- 1.) We were not aware that this data was required to be in visual sight at all times. We did have this data in our procedure manual.
 - 2.) We made copies of the data and posted on the bulletin board located in the hot lab.
 - 3.) This data will remain posted as required in 10 CFR-35.205 (d).
 - 4.) Full compliance achieved September 26, 1990.

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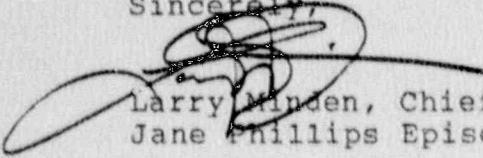
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- B. Failure to measure the ventilation rates in those rooms where Xenon-133 was used.
- 1.) We were not aware that these ventilation rates were required to be measured every six months.
 - 2.) We have contracted with Johnson Controls Inc. in Tulsa, Oklahoma to perform these ventilation rate measurements every six months.
 - 3.) This procedure is now included in our policy manual to be performed every six months as required in 10 CFR 35.205.
 - 4.) Johnson Controls, Inc. performed ventilation rate measurements September 26, 1990.
- C. Failure to test the dose calibrator down to the 10 microcurie limit.
- 1.) Our consulting Radiation Health Physicist did not require data testing the calibrator down to the 10 microcurie limit.
 - 2.) Sufficient data is now being collected to test the dose calibrator down to the 10 microcurie limit - (-3% at 8 microcuries).
 - 3.) This procedure is now included in our policy manual - at every calibration interval - data will be collected to test the equipment down to the 10 microcurie limit as required in 10 CFR 35.50 (b) (3).
 - 4.) Full compliance was achieved September 25, 1990 by collecting data to perform the dose calibrator linearity check and was tested down to 8 microcuries.

Sincerely,



Larry Minden, Chief Executive Officer
Jane Phillips Episcopal-Memorial Medical Center