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the art of caring and the science of healing...for life.

November 14, 1990

U.S. Nuclear Regulatory Commission Region III C.E. Norelius Division of Radiation Safety & Safeguards 799 Roosevelt Road Glen Ellyn, IL 60137

Dear Mr. Norelius:

PDC

901114

As a result of our meeting on October 22, 1990 and our efforts to prevent further violations of NRC safety regulations, we have revised our corrective action plan as follows:

- We have changed our policy on MO 99 breakthrough procedures to 1) reflect the current requirements set forth in 1987. See attachment H.
- 2) Our physicist has evaluated the exposure to 🕰 and has concluded, using maximum time assumptions, that she received approximately 8 Rems to the hand area. This is within the maximum allowable dose of 18.75 Rem/Quarter. Also, waist and collar badges for the month of September read -0-. This is a feasible dose since she was a weekend tech and rarely worked in flouroscopy. See attachment L.
- As a daily routine, I will inspect the survey records 3) to make sure that the appropriate tests are being done. This will encole me to take immediate action if appropriate radiation safety measures are not being followed.
- As a matter of clarification, Brian Parker was correct in 4) stating that we had missed 16 weekly wipe tests rather than 3.
- 5) We have revised all procedures in the procedure manual to eliminate abbreviation for millicuries and microcuries. See attachment G.
- In order to avoid assuming that Nuclear Medicine trainees 6) already have a waist and collar badge, I have added the waist and collar film badge in addition to the ring badge to the IE07 trainee orientation checklist. See attachment C.

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- 7) I have added all daily, weekly, and quarterly radiation safety test procedures to our quality assurance computer program. Each month the program will evaluate these tests for 100% compliance. See attachment E.
- 8) There was some concern expressed on your part that technicians doing the weekly wipe test were switching the Thyroid uptake probe back and forth between I 123 and Technitium. I have revised the weekly wipe test procedure to include and highlight the appropriate settings for I 123 and Technitium. See attachment .
- 9) Our procedure on hepatobiliary imaging has been corrected to include proper labeling of the administered dose and includes the manufacturer's recommended dose preparation instructions. All other procedures have been corrected to include manufacturer's dose preparation instructions as well. See attachment G.
- 10) Our linearity test procedure has been revised to carry the test down to 10 microcuries. See attachment J.
- 11) In the future, minutes of our Radiation Safety Committee meetings shall go to our QA coordinator and will be discussed along with the remainder of our QA items at the Hospital Quality Assurance Committee meeting each month.
- 12) I have drafted a training outline for individuals to do Nuclear Medicine procedures as well as a checklist for the Radiation Safety Officer who will oversee the training of each individual. See attachment K.
- 13) In order to further assure compliance, we are looking for a different physicist who will provide monthly rather than quarterly inspections/consultations.

We wish to thank you and your staff for your help and cooperation in dealing with these matters.

James Brand sincerely,

Jan/es Brand, RT/RDMS Radiology Manager

klm