

syncor

December 3, 1990

Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D.C. 20555

RE: DOCKET NO.: 030-15125
License No. 37-18461-01-MD
"Reply to a Notice of Violation"

Gentlemen:

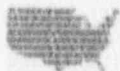
Syncor's management has made the decision to respond to your "Notice of Violation and Proposed Imposition of a Civil Penalty" by paying the civil penalty. The payment of this fine is not an admission of guilt but a desire to close this matter.

At this time I would like to clarify two statements made in your letter dated November 5, 1990. First, and I quote, "At the enforcement conference, your staff indicated that, as a result of the 1985 events, a specific training presentation was developed and provided to all employees regarding the security of licensed material in their vehicles and protection against unauthorized removal."

Dr. Mullen and Mr. Prosser, the Syncor employees attending the enforcement conference, were asked about this statement and they have denied the events of 1985 were even mentioned or discussed. The reason for my concern is that a specific training program was not developed as a result of the 1985 security violation which resulted in a \$2500 civil penalty. This program was in place prior to the violation and subsequent fine and the auditors of Syncor were already auditing for compliance in our 32 pharmacies.

As you are aware, your agencies did not identify any areas of non-compliance regarding a security violation for the next 5 years. During this time frame our company grew from 32 to 84 pharmacies.

In our continuing effort to help our field staff train new and existing personnel, we began the development of eight new training tapes in late 1989. These tapes were distributed to the field during May of 1990. One of these training tapes covered those training requirements listed in 10 CFR, 19.12. As a part of this tape there is a section dealing with specific training for Syncor's delivery personnel or customer service assistants (CSA). This section deals with security of licensed material in their vehicles, and protection



Innovators in high-tech pharmacy services

Syncor International Corporation • 20001 Prairie Street • Chatsworth, California 91311
(818) 886-7400 • FAX 886-6028 • Telex MCI 67-18642 Syncor CHATS

JF/AJ w/ check
\$12,500
239308

2012100143 201263
REGS LIC 30
37-18461-01MD FDC

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Page 2

against unauthorized removal. This program also deals with security measures at customer sites. As you can see these tapes were completed and in the field prior to the incident in Folcroft.

This leads to my second area of concern and I quote, "Your corrective actions as described above, while adequate, were not considered sufficiently comprehensive to warrant mitigation, (the actions narrowly focused on the specific violation at the Folcroft facility and did not evidence an adequate level of corporate involvement, particularly in light of previous problems in Grand Rapids and Hartford, to ensure that control of radioactive material is maintained at all of your facilities) and, therefore, no adjustment to the base civil penalty of this factor is appropriate."

I am concerned the U.S. Nuclear Regulatory Commission arrived at this conclusion because Syncor management was not adequately represented at the enforcement conference. At this time I would like to explain why I believe this.

When Mr. Frank Comer, the Corporate Radiation Safety Officer, was notified by Dr. Bettenhausen of the need for an enforcement conference, Mr. Comer was concerned and expressed his concern to Dr. Bettenhausen. This concern was based on the previous security violations in 1985, and the fact the violations in Folcroft were identified by the same NRC inspector who had identified the security violation which resulted in a fine in 1985. Mr. Comer asked Dr. Bettenhausen who from the corporate office should attend this meeting. Dr. Bettenhausen indicated Region I simply wanted to discuss the violations with the local manager, and that it would not be necessary for corporate management to attend the conference. Because of this conversation with Dr. Bettenhausen, corporate management made the decision not to attend the enforcement conference.

To assume Syncor management narrowly focused on the specific violation at the Folcroft facility and did not evidence an adequate level of corporate involvement is a wrong assumption. On two occasions, Mr. Comer called and talked to Dr. Shanbaky, Chief of Nuclear Materials Safety Section A, informing him of actions being taken by Syncor to address this matter corporate-wide.

To further support my belief, I am enclosing a series of documents which were generated as a result of the Folcroft inspection and subsequent enforcement conferences. The earliest document was generated by our eastern zone manager on Friday, September 7, 1990, two days after the enforcement conference. Additional information was sent to their respective pharmacies by other zone and regional managers, copies of which I have enclosed. Last but not least I have enclosed a letter which I wrote and sent to every Syncor employee at their home. While this information may not effect or mitigate the civil penalty, I want

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this information to become a part of the record which will be placed into the public document room.

The following is our "Reply to Notice of Violation":

I. VIOLATION ASSESSED A CIVIL PENALTY

10 CFR 20.297 (a) requires that licensed materials stored in an unrestricted area be secured against unauthorized removal from the place of storage. 10 CFR 20.207 (b) requires that materials not in storage be under constant surveillance and immediate control of the licensee. As defined in 10 CFR 20.3(a)(17), an unrestricted area is any area which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

Contrary to the above, on August 9, 1990, millicurie quantities of licensed material (specifically, Technetium-99m and Iodine 131) were placed in two motor vehicles located in the licensee's parking lot (unrestricted area) in Folcroft, Pennsylvania, and for approximately 10 minutes on that date, the materials were neither secured against unauthorized removal nor under constant surveillance and immediate control of the licensee. Specifically, both vehicles were left unlocked and unattended, and one of the vehicles had the keys in the ignition with the motor running. This is a Severity Level III violation (Supplement VI).

Civil Penalty - \$12,500.00

1. The violation is denied.
2. This violation is denied because the Syncor manager and the customer service assistants (CSA) allegedly involved in the violation have stated that another CSA was present in the parking lot. See attached employee statement.
3. Even though the violation is denied, Syncor recognizes the seriousness of this type of violation and has taken extensive corrective action, both at the Folcroft location and at all other Syncor locations.

The corrective actions relative to this alleged violation are:

- a. To hold a safety review with the Folcroft facility personnel focused on the need for security of unattended vehicles.
- b. To ensure implementation of Syncor's policy and the requirements of 10 CFR 20.207 (a)(b) requiring all unattended vehicles to be secured against entry or

theft and/or under constant surveillance and immediate control of the licensee. The results are achieved by having an individual provide surveillance over all vehicles being loaded with radioactive material during the early morning runs.

4. The corrective steps which have been taken to avoid further violations are those requiring surveillance by an individual during the early run.
5. Full compliance was achieved on August 10, 1990.

II. VIOLATION NOT ASSESSED A CIVIL PENALTY

Condition 17 of License No. 37-18461-01MD, requires that licensed material be transported in accordance with the provisions of 10 CFR 71. 10 CFR 71.5(a) requires, in part, that transportation of licensed material outside of the confines of the licensee's facility or other place of use be made in accordance with the applicable requirements of the Department of Transportation in 49 CFR 170-189.

49 CFR 173.448(a) requires that each shipment of radioactive materials be secured in order to prevent shifting during normal transportation.

1. This violation is admitted.
2. This violation was by a recently hired employee who failed to comply with his training with Syncor policy, and the provisions of 49 CFR 173.448 (a)(b). It was apparent that other employees were in compliance with this regulation as attested by the NRC inspector.
3. A meeting was held with the customer service assistants concerning securing radioactive packages in their vehicles. Individuals performing surveillance in the parking lot during package loading will also check to insure that packages are secured against movement during transport.
4. To avoid further violations, all vehicles will be checked to ensure that packages are secured against shifting during transport prior to leaving the parking lot. All customer service assistants have been directed to secure packages at all times during transport.

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5. Full compliance was achieved on August 10, 1990.

In summary, we have paid the fine rather than spend our resources and energy on administrative challenges. We will focus our time and energy on improving our quality results.

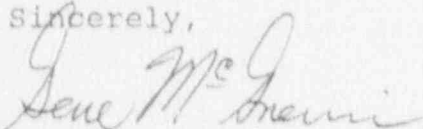
Historically, we have done an excellent job of providing quality products and services to our customers. For example:

+Syncor pharmacists make one error leading to a misadministration in every 50,000 doses drawn.

+The total industry average is one error leading to a misadministration in every 8,333 doses drawn.

In a recent letter to my fellow Syncor Employees I stated the following: "While we are better than the industry average..... these results are not good enough. Our goal must be ZERO errors. This goal must be accepted by everyone in the Company.....To pursue this goal, we must all believe and demonstrate that Syncor is dedicated to EXCELLENCE!.....Syncor is dedicated to QUALITY......Syncor is dedicated to being recognized as an ENVIRONMENTALLY RESPONSIBLE COMPANY!"

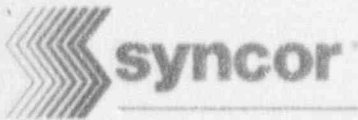
Sincerely,



Gene McGrevin
President and C.E.O.
Syncor International Corporation

GM:dlo
Enclosures

Enclosure: Employee Statements
Enforcement Memos
\$12,500.00 Civil Penalty check



November 14, 1990

Dear Fellow Syncor Employee:

Historically, Syncor has done an excellent job of providing quality products and services to our Radiopharmacy and Home Care customers. Our results in these highly regulated businesses speak for themselves. For example, in our Radiopharmacy business:

- Syncor pharmacies make one error leading to a misadministration in every 50,000 doses drawn.
- The total industry average is one error leading to a misadministration in every 8,333 doses drawn.

In other words, our quality is better than the industry average. However, these results are not good enough. To help you understand why we cannot be satisfied with these results, I would like to relate to you the business impact of making errors and not complying with regulations.

Recently we have received two letters of violation from the Nuclear Regulatory Commission (NRC). These violations have resulted in financial penalties. The first incident involved the preparation of "super" kits, record falsification and multiple misadministrations. While the NRC proposed a fine of \$20,000, it is currently in the appeal process.

The second incident occurred in one of our pharmacies in NRC Region I and it has resulted in a civil penalty of \$12,500. The NRC inspector identified two separate security violations. In each instance the Customer Service Assistants were in our parking lot and left their vehicle containing radioactive material unattended and unlocked.

This is the third time within the last five years the NRC has identified this problem at a Syncor facility and it is the second time we have received a fine. I have been told by members of the Quality and Regulatory Group future violations in this area could lead to a Severity Level II violation resulting in fines of six figures and additional operating penalties.

Last week I received a call from the NRC stating I would be faxed the press release of the latest incident. This press release will be sent to the various news media. Unfortunately, these isolated incidents are the ones that get press

(over)

syncor

September 4, 1990

When Syncor employee Christine Benko left her loaded car in the parking lot, there were 2 other Syncor employees present in the area. The drivers understood that the loaded vehicle was not unattended since at least one other employee was present in the area. The driver does not recall being questioned by the inspector prior to entering the building.

DATE: 9-4-90 *Christine Benko*

Syncor Employee Signature

CHRISTINE BENKO

*Innovators in high-tech pharmacy services*

syncor

September 4, 1990

When Syncor employee Bill Bennett left his loaded vehicle in the parking lot there were other Syncor employees in the parking lot. Mr. Bennett understood that if another Syncor employee was present in the area, the car was not unattended. He also does not recall being away from his car for ten minutes. This occurred during the inspection of 8/9/90.

DATE:

September 4, 1990

Syncor Employee Signature

William Bennett

BILL BENNETT

*Innovators in high-tech pharmacy services*

Date: Mon, 24 Sep 1990 11:09 edt

Via: 1

Via: 1

To: loc 03

To: loc 04

To: loc 06

To: loc 07

To: loc 13

To: loc 18

To: loc 19

To: loc 24

To: loc 26

To: loc 29

To: loc 34

To: loc 71

To: loc 72

To: loc 73

To: loc 80

To: loc 88

To: Brian Bender

To: Rodney Prosser

To: Peter van der Wal

To: Jeff Dzieweczynski

To: Joe Fery

Subject: (Forwarded) REGULATORY UPDATE

Cc: Syncor

EMS: Syncor

mbx: Jack Coffey

THIS MEMO IS TO BE CONSIDERED A WRITTEN WARNING TO ANYONE WHO LEAVES A VEHICLE UNSECURED. THAT INDIVIDUAL WILL BE TERMINATED IF THIS CONDITION OCCURS. THE VEHICLE MUST BE LOCKED AT ALL TIMES THAT THE DRIVER OF THAT VEHICLE IS NOT EITHER IN THE VEHICLE OR WITHIN ONE ARM'S LENGTH OF THAT VEHICLE. THE VEHICLE DOES NOT HAVE TO CONTAIN RADIOACTIVE MATERIAL FOR THE TERMINATION TO OCCUR.

ALL EMPLOYEES IN THE EASTERN ZONE ARE TO SIGN AND DATE THIS MEMO. IT IS TO BE RETURNED TO YOUR REGIONAL MANAGER BY 10/5/90.

YOUR COMPLIANCE WITH THE ABOVE IS APPRECIATED.

THANK YOU.

GARY REDMORE, ZONE DIRECTOR

Forwarded message

Date: Fri, 7 Sep 1990 10:50 edt

Via: 1

Via: 1

To: loc 03

To: loc 04

To: loc 06

To: loc 07

To: loc 13

To: loc 18

To: loc 19

To: loc 24
To: loc 26
To: loc 29
To: loc 34
To: loc 71
To: loc 72
To: loc 73
To: loc 80
To: loc 88
To: Rodney Prosser
To: Peter van der Wal
To: Jeff Dzieweczynski
To: Joe Fery
Subject: REGULATORY UPDATE
Cc: Syncor
EMS: Syncor
mbx: Jack Coffey

TO: EASTERN ZONE MANAGERS
FROM: RODNEY PROSSER
GARY REDMORE
DATE: 9/8/90
RE: REGULATORY ITEMS

On Wednesday, Rodney Prosser spent the morning with the NRC discussing recent regulatory violations that may have occurred in NRC Region One.

The NRC was very concerned about the blocking, bracing, and security of our packages. In addition to this, we received a violation for not completing the training as stated in our license application. By next week I would like each location to evaluate these items and comply with the following.

1. Every authorized user is to read the license application(s) by the end of October 1990. We are bound to this application. It is impossible for authorized users to comply, if they do not know what is in the application. All new authorized users are to read the license application(s) during their first four weeks of employment. Each authorized user is to read both State and NRC license applications on an annual basis. This is to be documented on the RS-59 form.

2. Every manager is to evaluate blocking, bracing and security of the radioactive packages. Three years ago, we received a violation for this in Region One and it resulted in a \$10,000 fine. At this point, I do not know what the NRC will implement as a result of the most recent violation. During your audits, I would like you to emphasize this area. Do spot inspections on your drivers. These inspections should be unannounced. They can be accomplished by waiting for your driver at the Nuclear Medicine Departments and escorting them to the parking lot. Make sure the delivery personnel are complying with the following:

1. The vehicle is locked.
2. Case covers or flip cards are being used.

3. . All packages including returns are secured.

I realize, that locations secure the packages in different ways. You should have an accepted method for your location and it should be followed. If you use cables in one car, then you should use cables in all cars.

It is important that the delivery personnel recognize the seriousness of a repeat violation in Region One. The next violation will cost us thousands of dollars. In addition to the fine, the cost of corrective action could be astronomical. How would you like to send two drivers on every run (one to drive and the second to verify the fact that the driver locked his car.)

Last of all, make sure that all drivers know that if they fail to secure their packages it could result in termination. The bottom line is that we can not afford another violation in this area.

I wish to thank Rodney for being concerned enough to provide the direction shown in this memo.

Have all employees sign this memo and return it to your Regional Manager.

End forwarded message

End forwarded message

Message. Dated: 11/13/90 at 1144.
Subject: Security Violations
Sender: Paul SALE / MCI/GW Contents: 3.

Part 1.

TO: Frank COMER / SYNCOR/00

Part 2.

MESSAGE HEADER.

Part 3.

Frank,
Here is the information that I had distributed to my region following a thorough discussion of the issue at my regional meeting the first week of October. You are already in receipt of a memo Joe Huber (St. Louis) wrote to his employees as a follow-up to this.
-Paul

Forwarded message

Date: Wed, 17 Oct 1990 20:05 cst
Via: 1
To: Loc 10
To: Loc 15
To: Loc 16
To: Loc 30
To: Loc 33
To: Loc 36
To: Loc 64
To: Loc 70
Subject: Security Violations
Cc: Curt Blaum

At our regional meeting we discussed the recent problem of security violations at several locations. As a follow-up to that discussion I am forwarding the memo from Jack and Richard addressing this issue since some of you may not have received it earlier.

This topic needs to be discussed with all employees as future violations will not be treated lightly by company auditors or other regulatory agencies. Remember that a violation in this area during a company audit will automatically put your location into the "below standards" ranking regardless of any other findings during the audit.

Thanks for your attention to this matter.

-Paul

TO: All NRC Locations, Regional and Zones
FROM: Jack Coffey
Richard Keese

SUBJECT: Security Violation in NRC Pharmacies

DATE: September 26, 1990

We have a potentially serious problem developing in our Nuclear Regulatory Commission (NRC) pharmacies. This problem relates to drivers placing radioactive material in UNLOCKED/UNATTENDED cars and then returning to the pharmacy.

Auditors from both the NRC and the Syncor Quality and Regulatory Department have recently issued violations for this infraction. This is serious and if not corrected immediately will lead to escalated enforcement by the NRC. Penalties usually associated with escalated enforcement include fines and /or modifying orders.

This violation can be prevented by:

1. requiring the drivers to lock their unattended cars when returning to the pharmacy for additional cases.
2. place an individual in the parking lot to maintain constant surveillance of the unattended automobiles.

Please take appropriate measures to prevent occurrence and/or reoccurrence.

Thank you,

Jack and Richard.

End forwarded message

COMER,FRANK / SYNCOR/00 - HPDesk print.

Message.

Dated: 11/09/90 at 0823.

Subject: LOCKING OF VEHICLES
Sender: Joe ZIPP / MCI/GW Contents: 3.
TO: Frank COMER / SYNCOR/00

Part 1.

TO: Frank COMER / SYNCOR/00
Richard KEESEE / SYNCOR/00

Part 2.

MESSAGE HEADER.

Part 3.

I knew there was another memo....I misfiled it! This one went out
October 7, 1990. Hope this will help.

Thanks, Joe

Forwarded message

Date: Sun, 7 Oct 1990 8:27 cst

Via: 1

Via: 1

To: Dennis Blair

To: Loc 17

To: Loc 28

To: Loc 37

To: Loc 38

To: Loc 39

To: Loc 47

To: Loc 48

To: Loc 63

To: Wade Hopkins

To: Loc 49

To: Loc 50

To: Loc 54

To: Loc 55

To: Loc 56

To: Loc 57

To: Loc 61

To: Loc 62

To: Loc 81

Subject: LOCKING OF VEHICLES

Managers,

Please be aware that we are in deep trouble with the regulatory agencies about leaving our delivery vehicles unlocked and unmanned while they contain RAM shipments. Please be forewarned that any internal audit finding a vehicle unlocked will immediately drop your pharmacy out of the satisfactory category. Again please remember that bonus payout is directly related to your location's regulatory performance.

Therefore, please meet with your staff and document that meeting as an in-service, with signatures of all personnel attending and file that document.

This meeting format will be to inform total staff that the delivery vehicle will be locked AT ALL TIMES regardless of RAM aboard or not. If we train ourselves to lock the vehicle every time we leave it, I feel it will become second nature to do so, rather than trying to remember to lock it when loaded with RAM and not locking it if not loaded. This may be a bit of an over kill, but with everyone having the direction TO KEEP THE VEHICLE LOCKED AT ALL TIMES, we should be under immediate compliance in this area.

Please remember as manager, it is your responsibility to monitor and assure compliance in the area.

Thanks, Joe

End forwarded message

COMER, FRANK / SYNCOR/00 - HPDesk print.

Message.

Dated: 11/08/90 at 1008.

Subject:

Sender: Joe ZIPP / MCI/GW

Contents: 3.

TO: Frank COMER / SYNCOR/00

Part 1.

TO: Frank COMER / SYNCOR/00
Richard KEESEE / SYNCOR/00

Part 2.

MESSAGE HEADER.

Part 3.

Gentlemen,

Attached is the directive I sent to the Central Zone Managers, October 16, 1990, requesting an IMMEDIATE audit of their pharmacy with emphasis placed in five categories. Please note category #4 was to focus on security violations in two areas...The automobile and the facility.

Thanks, Joe

Forwarded message

Date: Tue, 16 Oct 1990 13:04 cst

Via: 1

Subject: (Forwarded)

Via: 1

To: Dennis Blair

To: Loc 17

To: Loc 28

To: Loc 37

To: Loc 38

To: Loc 39

To: Loc 47

To: Loc 48

To: Loc 63

To: Wade Hopkins

To: Loc 49

To: Loc 50

To: Loc 54

To: Loc 55

To: Loc 56

To: Loc 57

To: Loc 61

To: Loc 62

To: Loc 81

Forwarded message

Subject: Quality and Regulatory Audit Emphasis

Message-Id: 62901018204926/0003327225NB3EM
Source-Msg-Id: 6776143 0 0 0 "MCI GW"&Verne TABACON

Managers,

Please do an immediate audit of your regulatory program's compliance in the following areas. Please correct any problems with a note to file..

"Internal audit discovered the following area of noncompliance

This area of noncompliance corrected as of _____ (date)"

Thanks,

Joe

1. Interim Final Rule - audit compliance in all NRC Pharmacies
2. Internal/External Exposure
 - a. Weekly Ring Badges - RS-15/17
 - b. Bioassy
 - c. Air Monitoring
 - d. RSO follow up of exposures exceeding corporate ALARA limits
3. MRSPL
 1. possession limits
 2. documentation of timely renewal of customer licenses
4. Radioactive Material security violations in the
 1. automobile
 2. facility
5. Driver compliance

End forwarded message

End forwarded message

COMER, FRANK / SYNCOR/00 - HPDesk print.

Message.

Dated: 11/09/90 at 0823.

Subject: Locking Vehicles

Sender: Joe ZIPP / MCI/GW

Contents: 4.

TO: Frank COMER / SYNCOR/00

Part 1.

TO: Jack COFFEY / SYNCOR/00
Frank COMER / SYNCOR/00
Richard KEESEE / SYNCOR/00

Part 2.

MESSAGE HEADER.

Part 3.

Expanded/Remote Distribution List

Dennis Blair

LOC 17

LOC 28

LOC 37

LOC 38

LOC 39

LOC 47

LOC 48

LOC 63

Wade Hopkins

LOC 49

LOC 50

LOC 54

LOC 55

LOC 56

LOC 57

LOC 61

LOC 62

LOC 81

Part 4.

Managers,

I am sure we are in total compliance in this area but PLEASE
TRIPLE CHECK!!!

I sent out a memo dated October 7, 1990 requesting that you each
conduct an in-service with your staff on "KEEPING THE VEHICLE
LOCKED AT ALL TIMES". I further asked that you documented this
in-service and have all personnel indicate their attendance by
signature and then file that in-service for later reference.
Please check to make sure this task was completed.

I sent another memo dated October 16, 1990 asking that you do an
immediate audit of your facility focusing on 5 specific points.
Point # 4 was to double check the security efforts being observed
both in the facility and in the automobile by your staff. Please
check to make sure this task was completed and documented.

The reason for my concern was to avoid what now has happened.
Another of our Syncor locations was found to have an unmanned,

unlocked vehicle containing radioactive materials by a regulatory agency and we are now faced with \$12,000 fine (this being our third violation)! The facility was not in the Central Zone (Thank the Lord), none the less, if another violation is found within ANY Syncor facility are next level of fine will be \$100,000 and the strong potential for another double verification mandate. Obviously we do not have the staffing levels to comply with such a mandate and our company will be history.

Therefore, effectively immediately, any Syncor employee (from a CSA through myself) found leaving a Syncor delivery vehicle unlocked will be immediately terminated.

For those individuals consciously locking our vehicles every time they leave them...Thanks, and a job well done! For any individuals failing to follow this directive please be forewarned.

Please post this memo and have all members of your staff sign as having read and understood this directive. Please then file this memo with your other documentation concerning the locking of vehicles.

Thanks in advance for your corporation,

Joe Zipp
Central Zone Director

IN-SERVICE ATTENDANCE RECORD

Lecture Title: Vehicle door locking policy
 Date: 10/15/90
 Instructor: Threadgill

Attended By The Following:

Name (Print)	Signature	Position
Gayle Medina	<i>Gayle Medina</i>	
Marci Welch	<i>Marci Welch</i>	
Steve Hilton	<i>Steve Hilton</i>	RPh
Don Paullett	<i>Don Paullett</i>	EM
Eric Boehmer	<i>Eric Boehmer</i>	RPh
Roger Rodriguez	<i>Roger Rodriguez</i>	
Joe Villaveca	<i>Joe Villaveca</i>	
Joe Matejka	<i>Joe Matejka</i>	Driver
Richard Buckner	<i>Richard Buckner</i>	Driver
Marc Elizalde	<i>Marc Elizalde</i>	Driver
Terry Fontaine	<i>Terry Fontaine</i>	Driver
Mike Reyna	<i>Mike Reyna</i>	
Tim Threadgill	<i>Tim Threadgill</i>	Pharmacist
Bob Placek	<i>Bob Placek</i>	

Topics Covered: Necessity of locking vehicles at all times, whenever it is left unattended, regardless of presence/absence of RAM.

Wed Oct 10, 1990 9:45 am EST

From: Joe Zipp / MCI ID: 349-7810

To: Dennis Blair / MCI ID: 403-2177
To: LOC 17 / MCI ID: 348-6733
To: LOC 28 / MCI ID: 347-6745
To: LOC 37 / MCI ID: 340-6762
To: LOC 38 / MCI ID: 347-6766
To: LOC 39 / MCI ID: 343-6770
To: LOC 47 / MCI ID: 341-6794
To: LOC 48 / MCI ID: 342-6795
To: LOC 63 / MCI ID: 345-6892
To: Wade Hopkins / MCI ID: 411-1616
To: LOC 49 / MCI ID: 343-6796
To: LOC 50 / MCI ID: 344-6797
To: LOC 54 / MCI ID: 340-6803
To: LOC 55 / MCI ID: 341-6804
To: LOC 56 / MCI ID: 342-6805
To: LOC 57 / MCI ID: 344-6807
To: LOC 61 / MCI ID: 343-6877
To: * LOC 62 / MCI ID: 349-6879
To: LOC 81 / MCI ID: 348-6911

Subject: LOCKING OF VEHICLES

Managers,

Please be aware that we are in deep trouble with the regulatory agencies about leaving our delivery vehicles unlocked and unmanned while they contain RAM shipments. Please be forewarned that any internal audit finding a vehicle unlocked will immediately drop your pharmacy out of the satisfactory category. Again please remember that bonus payouts are directly related to your location's regulatory performance.

Therefore, please meet with your staff and document that meeting as an in-service, with signatures of all personnel attending and file that document.

This meeting format will be to inform total staff that the delivery vehicle will be locked AT ALL TIMES regardless of RAM loaded or not. If we train ourselves to lock the vehicle every time we leave it, I feel it will become second nature to do so, rather than trying to remember to lock it when loaded with RAM and not locking it if not loaded. This may be a bit of an overkill, but with everyone having the direction TO KEEP THE VEHICLE LOCKED AT ALL TIMES, we should be under immediate compliance in this area.

Please remember as manager, it is your responsibility to monitor and assure compliance in the area.

Thanks, Joe

Command:

IN-SERVICE ATTENDANCE RECORD

Lecture Title: Locking Delivery Vehicles
 Date: 10/11/90
 Instructor: Mike Mettetal

Attended By The Following:

Name (Print)	Signature	Position
Mike Mettetal	<i>Mike Mettetal</i>	Pharm
Billy Webb	<i>Billy Webb</i>	Tech
Bill Carter	<i>Bill Carter</i>	Tech
Bao Nguyen	<i>Bao</i>	Pharm
Suzzy Cole	<i>S Cole</i>	Asst. Sup.
Bill Plemons	<i>Bill Plemons</i>	CSA

Topics Covered: All attachment

syncor

REVIEWED MONTHLY WITH ALL EMPLOYEES

TO: ALL EMPLOYEES
FROM: MICHAEL MULLIN
RE: VEHICLE SECURITY AND PACKAGE HANDLING

I was recently informed by senior management, in no uncertain terms, that due to the direct observations of an NRC and a corporate auditor the potential exists for a serious incident involving unsecured vehicles and radioactive materials. So that this serious problem can be rectified and resolved quickly the following procedures will be followed and adhered to by everyone.

1. Each individual is responsible for providing security to their car. DO NOT rely on the presence of another person in the vicinity. This means that if you have to walk away from the car that contains doses or returns you must lock the doors, put up the windows and lock the latch. No matter how briefly you plan to leave the car it must be secured. There will be no exceptions.
2. There will be direct surveillance of the 1st and 2nd run by members of the professional staff. You should NOT expect these people to provide security for your vehicle. They are there to make sure you are loading or unloading properly. There will also be spot checks here and at hospitals to ensure compliance.



Innovators in high-tech pharmacy services

3. There will be weekly training sessions to review related material.
4. All boxes are to be properly braced prior to leaving the parking lot.
5. All boxes incoming and outgoing will leave the building through the loading dock. Make sure that someone is on the dock when putting your packages there. The only exception will be when you have 1 or 2 boxes and can carry them in or out in one trip.
6. Due to the serious and sensitive nature of this problem anyone found violating these procedures can and will be discharged (fired) from the company.

LOCATION 72 FOLCROFT PA
SYNCOR VEHICLE SECURITY AUDIT FORM

DATE :

TIME :

AUDITOR :

WHERE AUDIT TOOK PLACE:

TAG NUMBER OF OBSERVED VEHICLE :

DRIVER UNDER OBSERVATION :

AUDIT CHECKLIST : 1. ALL DOORS LOCKED
2. WINDOWS UP
3. HATCH LOCKED
4. MATERIALS BRACED

AUDITOR COMMENTS.

Subject: ...
To: ...
From: ...

This memo is to be considered a written warning to anyone who leaves a vehicle unattended. That individual will be terminated if this condition occurs. The vehicle must be locked at all times that the driver of that vehicle is not either in the vehicle or within the 100' length of that vehicle. The vehicle does not have to contain radioactive material for the termination to occur.

All DR's issued in the Eastern time zone to expire and date of 10/1/90. It is to be returned to your regional manager by 10/1/90.

Your cooperation in this matter is appreciated.

Thank you.

Walt Malone, Zone Director

Subject: ...

Subject: ...

To: ...

To: ...

To: ...

To: ...

To: ...

To: ...

To: ...

To: ...

To: ...

To: ...

To: ...

To: ...

To: ...

To: Rodney Prosser

To: Peter van der Wal

To: Jeff Dorewiczak

Subject: ...

To: ...

To: Jack Coffey

Subject: ...

Subject: ...

William Patterson

Michael Walsh 9/26/90

Flaine ... 9-26-90

William Bennett 9/26/90

Pa. ... 9/26/90

Steph ... 9-26-90

Michael ... 9/26

Judy Albertson 9/26

Nick ... 9-26

John Warkins 9-26-90

Tom ... 9-26-90

Jim D. ... 9-26-90

Henry J. Jones - 9-26-90

Robert ... 9-26-

Cal ... 9-27-90

Michael ... 10/1/90

Patricia ... 10/1/90

... 10-2

... 10-2-90

... 10-2-90

BA ... 10-2-90

... 10-3

... 10-3-

Date: Mon Sep 24, 1990 10:24 am EST
From: Gary Redmore / MCI ID: 347-2587

TO: * LOC 13 / MCI ID: 345-6727
Subject: (Forwarded) REGULATORY UPDATE

THIS MEMO IS TO BE CONSIDERED A WRITTEN WARNING TO ANYONE WHO LEAVES A VEHICLE UNSECURED. THAT INDIVIDUAL WILL BE TERMINATED IF THIS CONDITION OCCURS. THE VEHICLE ~~MUST BE LOCKED AT ALL TIMES~~ THAT THE DRIVER OF THAT VEHICLE IS NOT EITHER IN THE VEHICLE OR ~~WITHIN ONE ARM'S LENGTH OF THAT VEHICLE~~. THE VEHICLE DOES NOT HAVE TO ~~CONTAIN~~ RADIOACTIVE MATERIAL FOR THE TERMINATION TO OCCUR.

~~ALL EMPLOYEES IN THE EASTERN ZONE ARE TO SIGN AND DATE THIS MEMO.~~ IT IS TO BE RETURNED TO YOUR REGIONAL MANAGER BY 10/5/90.

YOUR COMPLIANCE WITH THE ABOVE IS APPRECIATED.

THANK YOU.

GARY REDMORE, ZONE DIRECTOR

TO: EASTERN ZONE MANAGERS

FROM: RODNEY PROSSER
GARY REDMORE

DATE: 9/8/90

RE: REGULATORY ITEMS

On Wednesday, Rodney Prosser spent the morning with the NRC discussing recent regulatory violations that may have occurred in NRC Region One.

The NRC was very concerned about the blocking, bracing, and security of our packages. In addition to this, we received a violation for not completing the training as stated in our license application. By next week I would like each location to evaluate these items and comply with the following.

1. Every authorized user is to read the license application(s) by the end of October 1990. We are bound to this application. It is impossible for authorized users to comply, if they do not know what is in the application. All new authorized users are to read the license application(s) during their first four weeks of employment. Each authorized user is to read both State and NRC license applications on an annual basis. This is to be documented on the RS-59 form.

2. Every manager is to evaluate blocking, bracing and security of the radioactive packages. Three years ago, we received a violation for this in Region One and it resulted in a \$10,000 fine. At this point, I do not know what the NRC will implement as a result of the most recent violation. During your audits, I would like you to emphasize this area. Do spot inspections on your drivers. These inspections should be unannounced. They can be accomplished by waiting for your driver at the Nuclear Medicine Departments and escorting them to the parking lot. Make sure the delivery personnel are complying with the following:

1. The vehicle is locked.
2. Case covers or flip cards are being used.
3. All packages including returns are secured.

I realize, that locations secure the packages in different ways. You should have an accepted method for your location and it should be followed. If you use cables in one car, then you should use cables in all cars.

It is important that the delivery personnel recognize the seriousness of a repeat violation in Region One. The next violation will cost us thousands of dollars. In addition to the fine, the cost of corrective action could be astronomical. How would you like to send two drivers on every run (one to drive and the second to verify the fact that the driver locked his car.)

Last of all, make sure that all drivers know that if they fail to secure their packages it could result in termination. The bottom line is that we can not afford another violation in this area.

I wish to thank Rodney for being concerned enough to provide the direction shown in this memo.

Have all employees sign this memo and return it to your Regional Manager.

Robert Bellon
Ed Polanski, Sr.
Ed Lucas
John A. Bellafiore
Joe Murphy
John ...
...
...

Jan ...
Sch ...
Megan McDonald
Frank ...
Clayton Sargent

IN-SERVICE ATTENDANCE RECORD

LOC 18

Lecture Title: Vehicle Security Memo
 Date: 7/26/90
 Instructor: MEMO

Attended By The Following:

Name (Print)	Signature	Position
GASPAR NUÑEZ	<i>Gaspar Nuñez</i>	C.S.A.
SIBBIDI JAWED	<i>Jawed Sibbidi</i>	C.S.A.
Mohammad Mansoor, Butt	<i>Mansoor Butt</i>	D
FLOYD FRANK	<i>Floyd Frank</i>	CSA
HAL PRINCE	<i>Hal Prince</i>	C.S.A.
SAM LEDETOR	<i>Sam Ledetor</i>	C.S.A.
HENRY F. SEID	<i>Henry F. Seid</i>	C.S.A.
JEFF M. TORRES	<i>Jeff Torres</i>	C.S.A.
THOMAS MCKENNA	<i>Thomas McKenna</i>	C.S.A.
DAVIDO FONTANA	<i>David Fontana</i>	C.S.A.
Michael Burt	<i>Michael Burt</i>	C.S.A.
Bob Burt	<i>Bob Burt</i>	" "

Topics Covered:

Vehicle Security Policy - Gary Romero
 Claude Jolicoeur Jr. | *Claude Jolicoeur Jr.* C.S.A.

IN-SERVICE ATTENDANCE RECORD

Lecture Title: Vehicle Security MemoDate: 9/26/90Instructor: Memo

Attended By The Following:

Name (Print)	Signature	Position
Andrew Trunk	<i>[Signature]</i>	Dispatcher
Andrea Jacobs	<i>[Signature]</i>	SI Admin Sec
Lancy Gelberin	<i>[Signature]</i>	airmail
CHARLES PARRAGA	<i>[Signature]</i>	SR. LAB TECH
MATTHEW E. KORNENIK	<i>[Signature]</i>	Agency Intern
RICHARD BERNARD	<i>[Signature]</i>	Thomson Intern
ARCHIE YEE	<i>[Signature]</i>	Pharmacy Intern
JEROME McLENNON	<i>[Signature]</i>	RSS
George DiVita	<i>[Signature]</i>	Summit
KRISTIN COPPOLA	<i>[Signature]</i>	computer operator
GILBERT BARNETT	<i>[Signature]</i>	DISPATCHER
MARK ROSENTHAL	<i>[Signature]</i>	PHARMACIST
TOM OLIVEWICH	<i>[Signature]</i>	Asst. Mgr

Topics Covered:

Vehicle Security Policy - Gary Redmore

IN-SERVICE ATTENDANCE RECORD

Lecture Title: Vehicle Security Memo
 Date: 9/26/90
 Instructor: Memo

Attended By The Following:

Name (Print)	Signature	Position
SHARON BARLOW	<i>Sharon Barlow</i>	Secretary
STANLEY SUZMAN	<i>Stanley Suzman</i>	CSA
DAVE HOWELL	<i>David R. Howell</i>	CSA
RENZO N. ADDUCI	<i>Renzo N. Adduci</i>	APM
PETE VAN DER WIE	<i>Pete Van Der Wie</i>	REGIONAL OPERATIONS MGR
Joseph Ferry	<i>Joe Ferry</i>	Mgr.

Topics Covered:

Vehicle Security Policy - GRIV Review

19

THIS MEMO IS TO BE CONSIDERED A WRITTEN WARNING TO ANYONE WHO LEAVES A VEHICLE UNSECURED. THAT INDIVIDUAL WILL BE TERMINATED IF THIS CONDITION OCCURS. THE VEHICLE MUST BE LOCKED AT ALL TIMES THAT THE DRIVER OF THAT VEHICLE IS NOT EITHER IN THE VEHICLE OR WITHIN ONE ARM'S LENGTH OF THAT VEHICLE. THE VEHICLE DOES NOT HAVE TO CONTAIN RADIOACTIVE MATERIAL FOR THE TERMINATION TO OCCUR.

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YOUR COMPLIANCE WITH THE ABOVE IS APPRECIATED.

THANK YOU.

GARY REDMORE, ZONE DIRECTOR

Loc 19

RECEIVED
OCT 9 1990
GARY REDMORE

Forwarded message

Please sign and date on the appropriate line. Thank you

VINCENT RIZZO

Vincent Rizzo 10/2/90 DATE

KATHLEEN SERVIDIO

Kathleen Servidio 10/2/90 DATE

JAMES ANDERSON

James Anderson 10/2/90 DATE

NORMAN BECKMANN

Norman Beckmann 10/2/90 DATE

SANTOS MARTINEZ

- DISABLED - DATE

JESSE BOOKHART

Jesse Bookhart 10/2/90 DATE

TYRONE CONGERY

Tyrone Congery 10/2/90 DATE

SALVATORE MAZZARISI

Salvatore Mazzarisi 10/2/90 DATE

RICHARD GLENN

Richard E Glenn 10/2/90 DATE

JAMES MARTINEZ

James Martinez 10/3/90 DATE

ERNEST FREEMAN

(WILL HAVE HIS OWN FILE) DATE

KEVIN KELLY

(PTT - HAS NOT WORKED 3 WKS) DATE

CATHERINE PALLAY

Catherine Pallay 10/2/90 DATE

JOHN MUNAFO

(VACATION - P/T)

John Munafo 10/2/90 DATE

ALLEN LA VALLEY

Allen La Valley 10/3/90 DATE

RALPH POGOLOFF

Ralph Pogoloff DATE

JOSEPH MELONE

Joseph Melone DATE

DOUGLAS MARSHALL

Douglas Marshall DATE

ANTHONY SICA

Anthony A Sica 10/2/90 DATE

JAMES GORMAN

James Gorman 10-3-90 DATE

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THANK YOU.

GARY REDMORE, ZONE DIRECTOR

Forwarded message

Please sign and date on the appropriate line. Thank you.

VINCENT RIZZO	<i>Vincent Rizzo</i>	10/2/90	DATE
KATHLEEN SERVIDIO	<i>Kathleen Servidio</i>	10/2/90	DATE
JAMES ANDERSON	<i>James Anderson</i>	10/2/90	DATE
NORMAN BECKMANN	<i>Norman Beckmann</i>	10/2/90	DATE
SANTOS MARTINEZ	- DISABLED -		DATE
JESSE BOOKHART	<i>Jesse Bookhart</i>	10/2/90	DATE
TYRONE CONGERY	<i>Tyrone Congery</i>	10/2/90	DATE
SALVATORE MAZZARISI	<i>Salvatore Mazzarisi</i>	10/2/90	DATE
RICHARD GLENN	<i>Richard E Glenn</i>	10/2/90	DATE
JAMES MARTINEZ	<i>James Martinez</i>	10/3/90	DATE
ERNEST FREEMAN			DATE
KEVIN KELLY			DATE
CATHERINE PALLAY	<i>Catherine Pallay</i>	10/2/90	DATE
JOHN MUNAFO	(VACATION-PT)		DATE
ALLEN LA VALLEY	<i>Allen LaValley</i>	10/2/90	DATE
RALPH POGOLOFF	<i>Ralph Pogoloff</i>	10/3/90	DATE
JOSEPH MELONE	<i>Joseph Melone</i>	10/3/90	DATE
DOUGLAS MARSHALL			DATE
ANTHONY SICA	<i>Anthony A Sica</i>	10/2/90	DATE
JAMES GORMAN			DATE

Jan 2 10/2/90

TO: LOC 06 / MCI ID: 345-6714
 TO: LOC 07 / MCI ID: 347-6716
 TO: LOC 13 / MCI ID: 345-6727
 TO: LOC 18 / MCI ID: 349-6734
 TO: LOC 19 / MCI ID: 341-6736
 TO: LOC 24 / MCI ID: 343-6741
 TO: LOC 26 / MCI ID: 345-6743
 TO: LOC 29 / MCI ID: 348-6746
 TO: LOC 34 / MCI ID: 349-6750
 TO: LOC 71 / MCI ID: 345-6895
 TO: LOC 72 / MCI ID: 347-6897
 TO: LOC 73 / MCI ID: 348-6898
 TO: LOC 80 / MCI ID: 362-2436
 TO: LOC 88 / MCI ID: 364-2551
 TO: Brian Bender / MCI ID: 394-0024
 TO: Rodney Prosser / MCI ID: 405-6162
 TO: * Peter Van Der Wal / MCI ID: 381-8998
 TO: Jeff Dziejewczynski / MCI ID: 430-2885
 TO: Joe Fery / MCI ID: 434-0399
 CC: Syncor
 EMS: Syncor / MCI ID: 302-7225
 MBX: Jack Coffey

Loc 34

Subject: (Forwarded) REGULATORY UPDATE
 Message-Id: 03900924152430/0003472587NB4EM

THIS MEMO IS TO BE CONSIDERED A WRITTEN WARNING TO ANYONE WHO LEAVES A VEHICLE UNSECURED. THAT INDIVIDUAL WILL BE TERMINATED IF THIS CONDITION OCCURS. THE VEHICLE MUST BE LOCKED AT ALL TIMES THAT THE DRIVER OF THAT VEHICLE IS NOT EITHER IN THE VEHICLE OR WITHIN ONE ARM'S LENGTH OF THAT VEHICLE. THE VEHICLE DOES NOT HAVE TO CONTAIN RADIOACTIVE MATERIAL FOR THE TERMINATION TO OCCUR.

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YOUR COMPLIANCE WITH THE ABOVE IS APPRECIATED.

THANK YOU.

GARY REDMORE, ZONE DIRECTOR

[Signature]
Richard Manuel 10/2/90

Melissa Merrill 10/2/90

Jack

Let Jurchin 10/2/90

Wesley D. Little 10/2/90

Peter Jackson Brooks 10/02/90.

Paul Kowalczyk 10/2/90

P. Dziejewczynski 10/2/90

Paul White

Jessie Laidman 10/9/90

 Forwarded message

Date: Fri, 7 Sep 1990 10:50 edt
 Via: 1
 Via: 1
 To: loc 03
 To: loc 04
 To: loc 06
 To: loc 07
 To: loc 13
 To: loc 18
 To: loc 19
 To: loc 24
 To: loc 26
 To: loc 29
 To: loc 34
 To: loc 71
 To: loc 72

Loc 71

HS 59 (6/9/86)

IN-SERVICE ATTENDANCE RECORD

LOCKING YOUR VEHICLE/SECURING PACKAGES

Lecture Title: I UNDERSTAND IT IS MY RESPONSIBILITY TO KEEP MY VEHICLE LOCKED AT ALL TIMES. FAILURE TO DO SO MAY RESULT IN TERMINATION

Date: SEPTEMBER 11, 1990

Instructor: DOUG HUZAR

Attended By The Following:

Name (Print)	Signature	Position
DOUG HUZAR	<i>[Signature]</i>	
DAVE LAMONT	<i>[Signature]</i>	
CLIFF SALLALE	<i>[Signature]</i>	
DOUG ESANCY	<i>[Signature]</i>	
ANNETTE HUTCHINGS	<i>[Signature]</i>	
JOHN MCAVENY	<i>[Signature]</i>	
MARIO INGACOLA	<i>[Signature]</i>	
PAUL HARRINGTON	<i>[Signature]</i>	
PAULA GERGIA	<i>[Signature]</i>	
GODFREY RUPIA	<i>[Signature]</i>	
ARTY DUFFY	<i>[Signature]</i>	
KAREN FOWLER	<i>[Signature]</i>	
BERNIE ESANCY	<i>[Signature]</i>	
DAVE HANNUS	<i>[Signature]</i>	
BILL CONNORS	<i>[Signature]</i>	
BILL HARMAN	<i>[Signature]</i>	
MARK PACKARD	<i>[Signature]</i>	
JIM MALONE	<i>[Signature]</i>	
FRANK KVASNICEK	<i>[Signature]</i>	
RASSAD MUNIR	<i>[Signature]</i>	

Topics Covered:

Subject: (Forwarded) REGULATORY UPDATE
Message-Id: 03900924152430/0008472587NB4EM

Loc 80

THIS MEMO IS TO BE CONSIDERED A WRITTEN WARNING TO ANYONE WHO LEAVES A VEHICLE UNSECURED. THAT INDIVIDUAL WILL BE TERMINATED IF THIS CONDITION OCCURS. THE VEHICLE MUST BE LOCKED AT ALL TIMES THAT THE DRIVER OF THAT VEHICLE IS NOT EITHER IN THE VEHICLE OR WITHIN ONE ARM'S LENGTH OF THAT VEHICLE. THE VEHICLE DOES NOT HAVE TO CONTAIN RADIOACTIVE MATERIAL FOR THE TERMINATION TO OCCUR.

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THANK YOU.

GARY REDMORE, ZONE DIRECTOR

All Road + Slow

Paul J. ...
J. Brown
T. Christ
D. ...
Kathleen McCall
Paul ...
Wright
Washburn

Forwarded message

Date: Fri, 7 Sep 1990 10:50 edt
Via: 1
Via: 1
To: loc 03
To: loc 04
To: loc 06
To: loc 07
To: loc 13
To: loc 18
To: loc 19
To: loc 24
To: loc 26
To: loc 29
To: loc 34
To: loc 71
To: loc 72
To: loc 73
To: loc 80
To: loc 88
To: Rodney Prosser
To: Peter van der Wal
To: Jeff Dzieweczynski
To: Joe Fery
Subject: REGULATORY UPDATE
Cc: Syncor
EMS: Syncor
mbx: Jack Coffey

TO: EASTERN ZONE MANAGERS
FROM: RODNEY PROSSER
GARY REDMORE
DATE: 9/8/90
RE: REGULATORY ITEMS

On Wednesday, Rodney Prosser spent the morning with the NRC discussing recent regulatory violations that may have occurred in NPC Region One.

The NPC was very concerned about the blocking, bracing, and security of our packages. In addition to this, we received a violation for not completing the training as stated in our license application. By next week I would like each location to evaluate these items and comply with the following.

1. Every authorized user is to read the license application(s) by the end of October 1990. We are bound to this application. It is impossible for authorized users to comply, if they do not know what is in the application. All new authorized users are to read the license application(s) during their first four weeks of employment. Each authorized user is to read both State and NPC license applications on an annual basis. This is to be documented on the RS-59 form.

2. Every manager is to evaluate blocking, bracing and security of the radioactive packages. Three years ago, we received a violation for this in Region One and it resulted in a \$10,000 fine. At this point, I do not know what the NRC will implement as a result of the most recent violation. During your audits, I would like you to emphasize this area. Do spot inspections on your drivers. These inspections should be unannounced. They can be accomplished by waiting for your driver at the Nuclear Medicine Departments and escorting them to the parking lot. Make sure the delivery personnel are complying with the following:

1. The vehicle is locked.
2. Case covers or flip cards are being used.
3. All packages including returns are secured.

I realize, that locations secure the packages in different ways. You should have an accepted method for your location and it should be followed. If you use cables in one car, then you should use cables in all cars.

It is important that the delivery personnel recognize the seriousness of a repeat violation in Region One. The next violation will cost us thousands of dollars. In addition to the fine, the cost of corrective action could be astronomical. How would you like to send two drivers on every run (one to drive and the second to verify the fact that the driver locked his car.)

Last of all, make sure that all drivers know that if they fail to secure their packages it could result in termination. The bottom line is that we can not afford another violation in this area.

I wish to thank Rodney for being concerned enough to provide the direction shown in this memo.

Have all employees sign this memo and return it to your Regional Manager.

End forwarded message

End forwarded message

LOCATION 88

TO ALL EMPLOYEES:

ANY VEHICLE THAT IS FOUND OPEN, EITHER AT THE END OF THE DAY, OR UNATTENDED WHILE LOADING WILL RESULT IN THE DRIVER RESPONSIBLE FOR THAT VEHICLE BEING PUT ON IMMEDIATE ONE MONTH PROBATION. A SECOND OFFENSE WILL RESULT IN TERMINATION.

C.S.A. Cindy. Pussoman 9-24-90

MANAGER:

Jh. Curb

TO ALL EMPLOYEES:

ANY VEHICLE THAT IS FOUND OPEN, EITHER AT THE END OF THE DAY, OR UNATTENDED WHILE LOADING WILL RESULT IN THE DRIVER RESPONSIBLE FOR THAT VEHICLE BEING PUT ON IMMEDIATE ONE MONTH PROBATION. A SECOND OFFENSE WILL RESULT IN TERMINATION.

C.S.A.

MANAGER:

W. Steady 9/25/90
P. Conalt 9-25-90

TO ALL EMPLOYEES:

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C.S.A.

MANAGER:

P. Caldwell 9-25-90
Jama P. Hickey

TO ALL EMPLOYEES:

ANY VEHICLE THAT IS FOUND OPEN, EITHER AT THE END OF THE DAY,
OR UNATTENDED WHILE LOADING WILL RESULT IN THE DRIVER RESPONSIBLE
FOR THAT VEHICLE BEING PUT ON IMMEDIATE ONE MONTH PROBATION. A
SECOND OFFENSE WILL RESULT IN TERMINATION.

C.S.A.

Vern Mundy

MANAGER:

F. Condit 9-25-90

Vern

TO ALL EMPLOYEES:

ANY VEHICLE THAT IS FOUND OPEN, EITHER AT THE END OF THE DAY, OR UNATTENDED WHILE LOADING WILL RESULT IN THE DRIVER RESPONSIBLE FOR THAT VEHICLE BEING PUT ON IMMEDIATE ONE MONTH PROBATION. A SECOND OFFENSE WILL RESULT IN TERMINATION.

C.S.A.

MANAGER:

John Corbett 9-25-90
Herbert W. Hoffman

TO ALL EMPLOYEES:

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C.S.A.

MANAGER:

John Conalt 9-25-90
Herbert L. Wright

KEESEE, RICHARD / SYNCOR/00 - HPDesk print.

Richard Re
Frank JMC

Message.

Dated: 11/26/90 at 0956.

Subject: Security Violations

Sender: Randy ASMUS / MCI/GW (*)

Contents: 4.

TO: Richard KEESEE / SYNCOR/00

Part 1.

TO: Richard KEESEE / SYNCOR/00

Part 2.

MESSAGE HEADER.

Part 3.

Expanded/Remote Distribution List

LOC 01

LOC 02

LOC 05

LOC 08

LOC 09

LOC 11

LOC 23

LOC 25

LOC 27

Steve Shipper

Curt Blaum

Part 4.

All Managers:

In the past several weeks much attention and concern has been placed on the very important issue of security violations involving customer service assistants leaving radioactive material unattended and unlocked in delivery vehicles. I have discussed this matter with each of you to assure that 100% compliance is in immediate effect. My concern lies with the insurance that this problem does not ever present itself again. Never, ever, zero again!!!! I do not have to reiterate the consequences that will come about as stated in Gene's letter to the entire company.

Zero defects will be achieved only if we have the proper training and support from the local manager and professional staff. THE FOLLOWING STEPS MUST BE INSTITUTED IMMEDIATELY TO FURTHER ADDRESS THIS SERIOUS PROBLEM.

1. A RS-59 form must be read and signed by all employees and filed in the RS-59 and employee files.
2. All new employees will be trained by a professional staff member regarding this matter emphasizing the ramifications resulting from past NRC violations. (include Genes's letter for emphasis).
3. Manager and professional staff MUST continually monitor and audit the drivers for compliance.

4. A local policy must be developed and posted throughout the facility. The policy should include disciplinary actions that will be taken if 100% compliance is not met. No excuses will be accepted. A minimal of one written warning and the next occurrence would be termination. The RS-59 documentation can serve as the first warning.
5. Regional manager will audit local policy and hold the manager accountable for it's implimentation and compliance.
6. A minimal 4-6 month training and review should be performed to assure ongoing compliance. Make this a normal quarterly R/S function.
7. Develop a form to be used to document each employees receipt of training. An example follows:

SECURITY TRAINING DOCUMENTATION

EMPLOYEE SIGNATURE _____

DATE _____

TRAINER _____

LOCATION _____

I have read the following information concerning radioactive material security and have been trained and understand all NRC, Syncor and local policies.

- All drivers are required to lock their unattended vehicles when returning to the radiopharmacy for additional cases.
- An individual must be placed in the parking lot to maintain constant surveillance of the unlocked, unattended vehicle.
- All radioactive material packages must be locked in vehicles or attended to during deliveries to hospitals or final destinations.
- Failure to comply with these procedures will lead to severe disciplinary actions and/or termination.

Please remember that this must be a continued compliance effort with careful auditing and monitoring. We cannot survive any further NRC violations of this type.

Thank you for your concern of this matter.

Randy.

syncor®

TO: ALL SYNCOR EMPLOYEES
FROM: GARY REDMORE
DATE: SEPTEMBER 24, 1990
SUBJECT: REGULATORY UPDATE

THIS MEMO IS TO BE CONSIDERED A WRITTEN WARNING TO ANYONE WHO LEAVES A VEHICLE UNSECURED. THAT INDIVIDUAL WILL BE TERMINATED IF THIS CONDITION OCCURS. THE VEHICLE MUST BE LOCKED AT ALL TIMES THAT THE DRIVER OF THAT VEHICLE IS NOT EITHER IN THE VEHICLE OR WITHIN ONE ARM'S LENGTH OF THAT VEHICLE. THE VEHICLE DOES NOT HAVE TO CONTAIN RADIOACTIVE MATERIAL FOR THE TERMINATION TO OCCUR.

ALL EMPLOYEES IN THE EASTERN ZONE ARE TO SIGN AND DATE THIS MEMO.

YOUR COMPLIANCE WITH THE ABOVE IS APPRECIATED!!

THANK YOU,

GARY REDMORE, ZONE DIRECTOR

SIGNATURE: *Daniel Szymanski*
DATE: 11/9/90



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Parenteral Pharmacy Services • (716) 634-8279

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SIGNATURE: Joseph G. Gypczynski R.Ph.

DATE: 11/9/90



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GARY REDMORE, ZONE DIRECTOR

SIGNATURE: Pat Smith
DATE: 11 / 10 / 90



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SIGNATURE: Chad Horner
DATE: 11-10-90



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GARY REDMORE, ZONE DIRECTOR

SIGNATURE: Larry Redmore

DATE: 11/24/90



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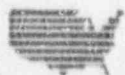
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SIGNATURE: _____

DATE: _____

Ray Romano
11-12-90



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GARY REDMORE, ZONE DIRECTOR

SIGNATURE: *Laurie Esterich*
DATE: 11/12/90



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SIGNATURE: _____

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Jason Reilly
11-12-90



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SIGNATURE: Teresa A Fusani
DATE: 11-9-90



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SIGNATURE: *Gary Redmore*

DATE: 11/12/90



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KEESEEE, RICHARD / SYNCOR/00 - HPDesk print.

Richard
Frank mc

Message.

Dated: 11/19/90 at 1239.

Subject: Securing of delivery vehicles

Sender: Greg HIATT / MCI/GW

Contents: 4.

TO: Richard KEESEEE / SYNCOR/00

Part 1.

TO: Jack COFFEY / SYNCOR/00
Richard KEESEEE / SYNCOR/00

*Save for
documentastic
purposes*

Part 2.

MESSAGE HEADER.

Part 3.

Expanded/Remote Distribution List

LOC 12
LOC 14
LOC 21
LOC 22
LOC 40
LOC 84
LOC 85
LOC 44
LOC 45
LOC 65
LOC 46
LOC 41
LOC 42
LOC 43
Loc 32
LOC 87
Susan Aggarwal
Jay R. Simon

Part 4.

November 19, 1990

TO: Pharmacy Managers
From: Greg Hiatt Western Zone Director

Managers:

I am sure you have all read about the recent violation Syncor received from the NRC due to improperly securing our delivery vehicles. As it has in the past, Regulatory is again reminding us that we need to monitor the loading and unloading of our vehicles.

In case you need additional guidance, Regulatory has printed a couple of articles on two of the hottest compliance items. These article can be found in the November 1990 issue of "Regulatory Briefs".

Because of the importance of the issues covered, I want everyone involved in the regulatory programs within the Western Zone to be absolutely certain that they review and understand the information contained in these articles. The first article pertains to compliance and the recent violations in NRC Regions I and III, and the second topic, a very important issue with all regulatory agencies, pertains to performing bioassays.

As Managers, we must be certain that we are following the company guidelines for the preparation of radiopharmaceuticals (November 1, 1990 revision) , that we keep up with our paperwork (no falsification of records) , and that we secure radioactive products at all times (outer facility doors secured, delivery vehicles secured). Of course there are more issues that we need to keep on top of but the current "hot" issues are stated above.

Let's not let the Company down.

Thanks,

Greg Hiatt

From Richard Keesee's recent message on the violation:

These violations were found by the NRC inspector who visited the
Folcroft site on August 9, 1990.

* The violation for which the fine is proposed involves two instances of
*radioactive material allegedly left unattended and unsecured in unlocked
*vehicles in an unsecured parking lot. In one instance, the keys were left in
*the vehicle and the motor was running.

In a letter informing the company of the inspection findings and
the proposed enforcement action, Thomas I. Martin, Regional
Administrator of NRC Region I, pointed out that NRC Inspectors had
found similar incidents involving failure to secure radioactive
materials in unrestricted areas during inspections of sites in
Grand Rapids, Michigan and Hartford, Ct. in 1985.

*Although the company had taken some corrective action after the earlier
*citations, those actions apparently were not effective in averting the
*latest violations.

