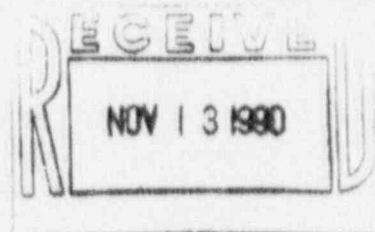


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PHYSICS CONSULTATION IN:
DIAGNOSTIC X-RAY
RADIATION THERAPY
NUCLEAR MEDICINE
RADIOGRAPHY
INSTRUMENTATION

LEAK TESTING
SHIELDING DESIGN
RADIATION SAFETY
PERSONNEL MONITORING
NRC LICENSE APPLICATIONS
STATE AND FEDERAL COMPLIANCE

November 9, 1990

United States Nuclear
Regulatory Commission
Washington D.C. 20555

Attn: Document Control Desk

Docket No: 30-28885/90-01
License No: 35-23197-01

Dear Sirs:

This correspondence is generated to response to your Notice Of Violation. I have discussed this matter with Mr. Bill Abbott, Nuclear Medicine Technologist and Mr. Art Shackelford, Administrator.

Violation A

1. Violation A occurred because of Mr. Abbott's misunderstanding regarding solid waste. In the early phases of the Nuclear Medicine Program in 1988, it was noted that cotton balls and swabs generally have only very small amounts of activity associated with them and the practice of discarding them in sanitary sewage was started.
2. The corrective steps to resolve this matter have included the understanding on the part of Mr. Abbott that the NRC does consider these materials to be low level waste which must be held for decay and surveyed before disposal at background levels.
3. This is now part of standard practice so the problem should not appear in the future.
4. Full compliance was reached on September 18, 1990.

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Violation B

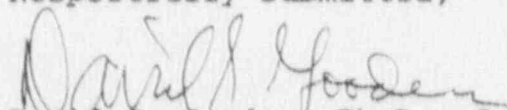
1. Violation B is contested. The reason for this is that Mr. Bill Abbott is the appointed administrative representative to the Radiation Safety Committee. Mr. Abbott operates directly as Mr. Art Shackelford's representative in Radiation Safety Committee matters as well as all matters associated with the Nuclear Medicine program. Mr. Abbott was present at the meeting in question.

Violation C

1. Violation C occurred because the consulting radiological physicist had not required data to be taken to the ten microcurie level.
2. Dr. Gooden now understands that the NRC regulations and Region IV inspectors require linearity data to be taken to this level.
3. The consulting radiological physicist will require data down to ten microcuries for all future linearity checks.
4. Full compliance was reached on September 20, 1990

Thank you for attention in this matter.

Respectfully submitted,


David S. Gooden, Ph.D., J.D.
Radiological Physics Consultant to
Craig County General Hospital

DSG/jbk

cc: Regional Administrator, ✓
NRC Region IV