



Department of
Veterans Affairs

License File
24-00144-05

November 7, 1990

In Reply Refer to: 657/115

U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

SUBJ: Response to Notice of Violation (Docket No. 030-02267)

1. The origin of some of the items cited rests in changes which were affected during the period from May of 1986 to February of 1989, when our license was engaged in the renewal process. These changes were made in anticipation of regulatory changes. Also, within several months following receipt of our renewal in 1989, our license was involved in an amendment request. During the past four years, there have only been a few months when these changes could have been incorporated by an amendment request. The recent change in Radiation Control Officer (RCO) is also a contributing factor. Miscommunication among the Radiation Control staff and several lengthy periods of understaffing resulted in the RCO not being aware of the details of every procedure which had been altered during this period. Therefore, the RCO did not realize that license conditions were being violated.

2. Corrective action for cited violations are indicated below.

a. Item #1. The waste area in question will be surveyed weekly and the results recorded.

b. Item #2. All diagnostic misadministrations will be reviewed by the RCO using a protocol incorporating, as a minimum, items from NRC Form #473 and 35.33 (c) and (d), so that every possible requirement for reporting has been examined.

c. Item #3. In examining the conditions of our license, we can find no commitment to employ direct thyroid burden assessment as the sole method of bioassay for iodine. While action levels are specified in terms of burden, assessment of intake after each exposure has assured that action levels were never reached. While urinalysis has been used for this purpose, no exact method is actually specified in our license. We plan on submitting a complete bioassay program for your approval, but would prefer to do so in the context of a broad amendment, incorporating other program improvements as well.

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If it is your decision that our current practice is not in compliance with license requirements, please indicate the exact license conditions regarding bioassay that you feel we must follow in order to be in full compliance.

We believe that the corrective actions outlined above will put the medical center in full compliance with conditions outlined in our NRC license.

3. If you have further questions regarding this response, you may contact the RCO, Larry Chandler, at FTS# 278-6350.



JOHN T. CARSON
Medical Center Director