

# DEPARTMENT OF VETERANS AFFAIRS Franklin Delano Roosevelt Hospital Montrose NY 10548

In Reply Refer To:

MAY 1 0 1994

Docket No. 030-12782 License No. 31-17455-01 Inspection No. 030-12782/94-001

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

SUBJECT: REPLY TO A NOTICE OF VIOLATION

This communication is in response to the violations cited in Appendix A of the Nuclear Regulatory Commission report dated April 14, 1994. Please find enclosed Attachment A. This attachment details the corrective action plan for each of the violations.

LEE J. KAUPER Director

enclosures (7):

Jenny M. Johansen, Chief
Medical Inspection Section
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

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CC: Department of Veterans Affairs ATTN: Francis K. Herbig Health Physics Programs (115HP) 915 North Grand Boulevard St. Louis, MO 63106

Program Director Nuclear MEdicine Service (111E) Department of Veterans Affairs 24 Frank Lloyd Wright Drive, Lobby M PO Box 505 Ann Arbor, MI 48106

#### Item A

Respondent:

V.A. Hospital, Montrose, NY 10548-0100 Docket No. 030-12782

Docket No. 030-12782 License No. 31-17455-01

# Violation

The V.A. Hospital did not test its dose calibrator for linearity at the time of installation as required under 10 CFR 35.50(b)(3)

# Explanation

This appears to be an area where internal procedures were deficient.

# Corrective Action

The V.A. Hospital shall test the dose calibrator for linearity upon installation and at least quarterly thereafter over the range of its use between the highest dosage that will be administered to a patient and 10 microcuries.

Completion Date

June 1994

## Item B

Respondent:

V.A. Hospital, Montrose, NY 10548-0100

Docket No. 030-12782 License No. 31-17455-01

# Violation

The V.A. Hospital did not calibrate the Ludlum model 14C survey instrument at two separate readings on the times 1000 scale as required under 10 CFR 35.51(a).

# Explanation

The individual calibrating the survey instrument was aware of 10 CFR 35.51(a). He had chosen to bypass the times 1000 scale calibration because it was not a level of radiation that would be encountered in the nuclear medicine suite.

# Corrective Action

The Ludlum model 14C survey instrument was recalibrated on April 28, 1994. This calibration was performed in accordance with 10 CFR 35.51(a), including 2 readings on the times 1000 scale. All future calibrations will be performed in accordance with 10 CFR 35.51(a).

Completion Date

## Item C

Respondent:

V.A. Hospital, Montrose, NY 10548-0100 Docket No. 030-12782

Docket No. 030-12782 License No. 31-17455-01

# Violation

The V.A. Hospital employed the Picker survey meter as calibrated even though the indicated exposure rate differed from the calculated exposure rate by greater than 20 percent.

# Explanation

The Picker survey meter was only retained as a back-up. It was not employed for surveys in the nuclear medicine department.

# Corrective Action

The Picker survey meter will be removed from the nuclear medicine department.

Completion Date

## Item D

Respondent:

V.A. Hospital, Montrose, NY 10548-0100 Docket No. 030-12782

Docket No. 030-12782 License No. 31-17455-01

# Violation

The V.A. Hospital did not survey the radiopharmaceutical receipt area as required under 10 CFR 35.70(b).

# Explanation

This appears to be an area where internal procedures were deficient.

## Corrective Action

An annual refresher training course was provided for nuclear medicine personnel on May 6, 1994. The requirement for weekly ambient surveys of the radiopharmaceutical storage area was covered in this refresher.

Completion Date

May 1994

## Item E

Respondent: V.A. Hospital, Montrose, NY 10548-0100 Docket No. 030-12782

Docket No. 030-12782 License No. 31-17455-01

# Violation

An employee of the V.A. Hospital did not wear gloves when handling radioactive material as required under the terms of License No. 31-17455-01.

# Explanation

The individual was aware of the need to wear gloves when handling radioactive material. The individual was nervous due to the presence of the inspector and he neglected to wear gloves.

# Corrective Action

An annual refresher training course was provided for nuclear medicine personnel on May 6, 1994. The need to wear gloves when handling radioactive material was reviewed at that time.

Completion Date

May 1994

## Item F

Respondent:

V.A. Hospital, Montrose, NY 10548-0100 Docket No. 030-12782

Docket No. 030-12/82 License No. 31-17455-01

# Violation

The V.A. Hospital did not retain records of the linearity or the geometry dependence tests of its loaner dose calibrator as required under 10 CFR 35.50(e).

# Explanation

This appears to be an area where internal procedures were deficient.

## Corrective Action

When leaner dose calibrators are employed in the future, records pertaining to linearity and geometry dependance shall be obtained and maintained as required under 10 CFR 35.50(e). Efforts are presently underway to obtain the records of the dose calibrator used from November 16 to 24, 1992.

Completion Date

## Item G

Respondent: V.A. Hospital, Montrose, NY 10548-0100 Docket No. 030-12782

Docket No. 030-12782 License No. 31-17455-01

# Violation

The V.A. Hospital did not identify the model number and serial number of sealed sources that were surveyed for leakage as required under 10 CFR 35.59(d).

# Explanation

This appears to be an area where internal procedures were deficient.

# Corrective Action

Sealed source wipe tests were performed on all sealed sources on April 28, 1994. A new form used to record these results documents the model number and serial number of the individual sources.

Completion Date