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MERCY HEALTH SERVICES NORTH

1100 MICHIGAN AVENUE GRAYLING, MICHIGAN 49738 (517) 348-5461

December 13, 1990

R.J. Caniano, Chief
Nuclear Medicine Safety Section 2
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: NRC License No. 21-16489-01
Docket No. 030-11125

Dear Mr. Caniano:

The following information is provided in response to the Notice of Violation report dated November 27, 1990 from the inspection conducted at our facility on November 16, 1990. The response below pertains to the violations which were identified during the inspection.

Violation 1: Failure of the Radiation Safety Committee to meet during the fourth quarters of 1987 and 1989. Failure to establish a quorum for the Radiation Safety Committee meeting which was held on September 28, 1990, in that the Radiation Safety Officer was not present.

Response: In the past, a fixed schedule was not established each year to determine the dates that the quarterly Radiation Safety Committee Meetings would be conducted. Consequently, the RSC meetings were missed on several occasions. However, specific dates have now been selected for the Radiation Safety Committee meetings. The 1991 RSC meetings will be conducted on the second Tuesday of the following months: February, May, August and November. Dates for the Radiation Safety Committee meetings for subsequent years will be scheduled in the same manner so as to remain in compliance with the quarterly meeting requirement which is outlined in 10 CFR 35.22(a)(2).

In addition, we are aware that in order to establish a quorum and to conduct business, at least one-half of the Committee's membership must be present, including the Radiation Safety Officer and the management's representative as specified in 10 CFR 35.22(a)(3). By scheduling the RSC meetings at the beginning of each year, we feel that the RSC and management representative will have ample time to adjust their schedules to accommodate the RSC meeting schedule. Full compliance with this item was achieved in December, 1991.

MERCY HOSPITAL/GRAYLING

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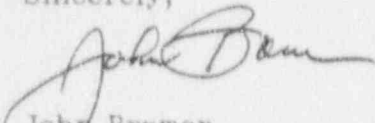
Violation 2: Failure to maintain records of the results of checking a 1800 millicurie molybdenum-technetium generator which was received on approximately February 19, 1990.

Response: We are aware that every incoming package which contains radioactive materials must be surveyed and wipe tested in accordance with the provisions which are outlined in Item #14 of our NRC license application received December 11, 1985. We are also aware that records of checking each package must be maintained.

Failure to monitor the molybdenum-technetium generator on approximately February 19, 1990 was an oversight on behalf of the technicians. Therefore, the Nuclear Medicine Technicians were reminded to monitor and wipe test all incoming packages which contain radioactive materials and to document the results. Full compliance with this issue was also achieved in December, 1990.

We hope this information has adequately addressed the violations which were listed in the Notice of Violation dated November 17, 1990. If additional information is required, please contact me.

Sincerely,



John Bremer
Director, Clinical Services