

PED/PCB

DEC 27 1990

Port Huron Hospital
ATTN: Don Fletcher
President
1001 Kearney St.
Port Huron, MI 48060

License No. 21-20137-01
Docket No. 030-18005

Gentlemen:

This refers to the routine safety inspection conducted by Ms. C. C. Casey of this office on November 14, 1990 of activities authorized by NRC byproduct Material License No. 21-20137-01 and to the discussion of our findings with Mr. Al Wildman and Dr. Clare Scheurer at the conclusion of the inspection.

This also refers to the management conference conducted by telephone on December 3, 1990 between Robert Rednerek and other members of your staff and me and other members of my staff. The conference included a discussion of the apparent violations, their significance, and causes and our concern over the management oversight of your program. The discussion of your corrective actions included having Security escort couriers to deliver the generator inside the locked hot lab; moving the gamma counter into the imaging suite; improving your personnel training program and scheduling in-servicing to be completed by January 31, 1991; checking elution/molybdenum-99 test records to ensure that the molybdenum concentration is expressed as a ratio; and establishing a "tickler" chart of records, that your Radiation Safety Officer must sign, as a tracking system.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and with the conditions of your license. The inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

In addition to the above areas, the inspector examined actions described in your letter dated January 16, 1987, regarding apparent violations found during our December 17, 1986, inspection. We have no further questions regarding these matters.

During this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice. With respect to Item 6, the inspection showed that actions had been taken to correct the identified violation and to prevent recurrence. Consequently, no reply to the violation is required and we have no further questions regarding this matter at this time. Regarding the remaining items, a written response is required.

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In addition to the specific violations identified, and as discussed during our telephone conference, we are concerned about your lack of management oversight of the radiation safety program. Specifically, we are concerned about the lack of verification, as by checking, auditing and inspecting to ensure that licensed activities are correctly performed. Additionally, we are concerned about your procedures for ensuring continued compliance throughout periods of transitions, such as changes in equipment, personnel or facilities. Therefore, in your response to this letter, address the actions you will take to improve your management oversight in these two areas.

Because the violations did not result in a safety issue, we have chosen not to classify these violations at a Severity level III or issue a civil penalty. However, we expect your corrective actions to continue to be effective. Repeated poor performance will be the basis for further enforcement actions.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

John A. Grobe, Chief
Nuclear Materials Safety Branch

Enclosure: Notice of Violation

cc w/enclosure:
DCD/DCR (RIDS)
C. Pederson

RIII

Casey

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12/27/90

RIII

Canino

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RIII

Grobe

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