



COMMUNITY HOSPITALS OF WILLIAMS COUNTY, INC.

• 433 W High St
• 909 Snyder Ave

Bryan, Ohio 43506-1617
Montpelier, Ohio 43543-0189

DCP/DCB

December 19, 1990

William H. Schultz,
Chief - Nuclear Materials Safety
U.S. NUCLEAR REGULATORY COMMISSION
REGION III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

In re: Response to Notice of Violation
COMMUNITY HOSPITALS OF WILLIAMS COUNTY, INC.
433 West High Street
Bryan, OH 43506-1617
License No. 34-15653-02
Docket No. 030-13938

Dear Mr. Schultz:

Pursuant to the Provisions of 10 CFR 2.201, I am submitting the following response to the Notice of Violation received by our facility on December 1, 1990.

ITEM 1. SEVERITY LEVEL IV: VISITING AUTHORIZED USER POLICY

A. CORRECTIVE STEPS TAKEN

Not applicable in this instance, since the incident occurred four months ago.

B. CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

A. As President and Chief Executive Officer of the Community Hospitals of Williams County, Inc., I will exercise the appropriate action to ensure that the conditions listed in 10 CFR 35.27 A. and B. will be met by our institution.

B. At its next meeting, Radiation Safety Committee will review for approval the attached Policy regarding the use of visiting physicians to provide Radiologist coverage during an authorized user's absence.

C. EXPECTED DATE OF FULL COMPLIANCE

A. I am now aware of the accepted procedure and will ensure its immediate compliance.

B. The RSC will meet to review for approval this procedure before the end of the first calendar quarter of 1991.

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ITEM 2. SEVERITY LEVEL IV: LINEARITY TEST FOR DOSE CALIBRATOR

A. CORRECTIVE STEPS TAKEN

A. A dose calibrator linearity test was performed November 19 through November 21, 1990, over the range of its use between the highest dosage for patient use to below 10 μ CI (2.9 μ CI actual).

B. The results of this test are in compliance with required values, and have been reviewed and approved (by signature) by the Radiation Safety Officer.

B. CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

A. The method for performing the linearity test has been reviewed by our Technologists who may be performing the test.

B. Our consulting Radiation Physicist has instructed the Technologist who performs the test in the methodology required to evaluate linearity between 25 MCI and 10 μ CI using the shield method. Each test will be performed with two different initial activities, since the range of activities required for testing exceeds the shielding capability of the sleeves used.

C. EXPECTED DATE OF FULL COMPLIANCE

Full compliance was achieved on November 22, 1990.

ITEM 3. SEVERITY LEVEL V: RADIATION SAFETY OFFICER SIGNATURE OF RECORDS

A. CORRECTIVE STEPS TAKEN

The Radiation Safety Officer has reviewed and signed the records indicated by the Notice of Violation. All records were approved for content and compliance as evidenced by his signature.

B. CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

A. A checklist has been drawn up to ensure by date and Technologist initial that the appropriate records have been presented for review and approval by the Radiation Safety Officer.

B. A checklist has been given to the Radiation Safety Officer as a reminder of the records which require his signature, with an indication as to the frequency with which those records are generated.

Continued

Item 3, B, Corrective Steps Taken to Avoid Further Violations, continued

C. A status report record signed by the Radiation Safety Officer will be filed with the Radiation Safety Committee. This record will indicate the records reviewed, the date of review, and the Radiation Safety Officer's signature indicating approval of those records.

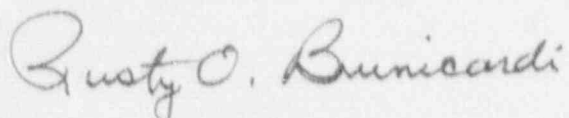
C. EXPECTED DATE OF FULL COMPLIANCE

A. The records indicated have already been signed by the Radiation Safety Officer.

B. The checklist method will be initiated January 1, 1991.

Should you require further clarification regarding this response, please contact me at (419) 636-1131.

Sincerely,



Rusty O. Brunicardi,
President/Chief Executive Officer

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PROPOSED POLICY
TEMPORARY PHYSICIAN COVERAGE
DEPARTMENT OF RADIOLOGY

Physicians providing LOCUM TENENS coverage (otherwise known as visiting authorized users) for authorized users* of radioactive materials may use licensed radioactive material, provided that:

- A. The visiting authorized user has the written permission of the management of Community Hospitals of Williams County, Inc.
- B. The visiting authorized user has the written permission of the Radiation Safety Committee.
- C. The visiting authorized user provides a copy of the license issued by the Nuclear Regulatory Commission that identifies the visiting authorized user by name and as an individual who is authorized to use Radioisotopes for medical purposes.

THIS INFORMATION AND SUBSEQUENT APPROVALS MUST BE OBTAINED PRIOR TO THE EMPLOYMENT OF THE PHYSICIAN IN THE LOCUM TENENS CAPACITY.

*An authorized user is a physician who has been granted permission by the Nuclear Regulatory Commission to use certain Radioactive Isotopes for diagnostic and therapeutic purposes.

December 19, 1990