

DEC 24 1990

In Reply Refer To:  
Licenses: 42-00220-06  
          42-00220-08  
Dockets: 30-03256/90-01  
          30-00503/90-01

Department of Veterans Affairs  
Medical Center  
ATTN: John Gardner  
      Acting Director  
4500 South Lancaster Road  
Dallas, Texas 75216

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Mr. Selvan Rajendran and Ms. Billie Gruszynski of this office on August 15-17, 1990, of activities authorized by NRC Byproduct Material License Nos. 42-00220-06 and 42-00220-08, and to the discussion of our findings held by the inspectors with members of your staff at the conclusion of the inspection.

The inspection was an examination of activities conducted under the licenses as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of the licenses. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, independent measurements, and observations by the inspectors. The inspectors noted that the radiation safety program for the nuclear medicine and teletherapy departments appeared to be adequately managed by the radiation safety officer (RSO). The research area showed some improvements since the last inspection, but the program needs to be improved even further in order to ensure that all aspects of the radiation safety program are met. The inspectors noted that current radiation safety staffing may be inadequate for a program of your size.

During this inspection, certain of your activities were found not to be conducted in full compliance with NRC requirements. Consequently, you are required to respond to this matter in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violations enclosed with this letter.

The inspectors also reviewed actions you had taken with respect to the violations observed during our previous inspection conducted on August 29-30, 1989. They verified that corrective actions for the violations had been implemented as stated in your replies dated November 14 and December 28, 1989. However, they noted that Violation C has recurred since the previous inspection. This item is identified as Violation 1 in Appendix A.

\*RIV:NMLS  
SRajendran:lm  
  / /90

\*NMLS  
BRGruszynski  
  / /90

\*C:NMLS  
WLFisher  
  / /90

D:DRSS  
DABBeachey  
12/21/90 for

\*Previously Concurred

9101030112 901224  
REGA LIC30 PDR  
42-00220-06

020009

IE-07  
1/1

We are concerned about the implementation of your program in the area of management control, in that your corrective action was not effective in preventing recurrence of a violation. Consequently, in your reply to this letter, you should describe those specific actions planned or taken to improve effectiveness of the management control of your licensed operations, particularly in regard to your research areas, with particular emphasis on measures currently being taken to prevent further violations.

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 response directed by this letter and the accompanying Notice is 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.

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

Original Signed By

*for* *Larry Yandell*  
A. Bill Beach, Director  
Division of Radiation Safety  
and Safeguards

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - Notice of Violation

cc:

Texas Radiation Control Program Director

bcc:

DMB - Original (IE-07)  
RDMartin  
ABBeach  
LAYandell  
MRodriguez, OC/LFDCB (4503)  
\*CLCain  
\*WLFisher  
\*SRajendran

\*BRGruszynski  
\*NMSIS  
\*MIS System  
\*RIV Files (2)  
\*RSTS Operator  
\*REHall, URFO

\*W/766