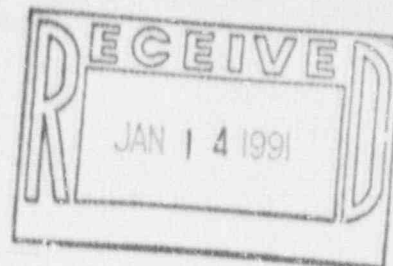




DEPARTMENT OF VETERANS AFFAIRS

Medical Center  
1055 Clermont Street  
Denver CO 80220



JAN 08 1991

Mr. A. Bill Beach  
U.S. Nuclear Regulatory Commission  
Region IV  
Division of Radiation Safety and Safeguards  
611 Ryan Plaza Drive, Suite 100  
Arlington, TX 76011

In Reply Refer To:

RE: License #05-01401-02

Dear Mr. Beach:

Thank you for your letter of December 27, 1990. Our response to your request for further clarification on the Notice of Violations dated October 11, 1990 is as follows;

Violation 2:

3) Corrective Action Taken to Avoid Further Violations

Further violations concerning failure to measure ventilation rates in areas of radioactive gas use and failure to do monthly checks of the collection systems will not occur because we are no longer using radioactive gases and the Ventil-Con has been removed from service.

4) Date of Full Compliance

We terminated the use of radioactive gases on June 30, 1990. The Ventil-Con was placed in storage on September 15, 1990. Therefore, we feel we have been in full compliance with 10 CFR 25.305(e) since September 15, 1990.

Violation 3:

3) Corrective Action Taken to Avoid Further Violations

Further violations concerning monitoring of radioactive packages will be avoided since we now survey all generators and their packages upon receipt and prior to shipping. The new procedure form includes both incoming and outgoing monitoring (see attached).

4) Date of Full Compliance

This new form has been in use since October 15, 1990 and therefore we are now in compliance with 10 CFR 71.5(a) and 49 CFR 173.475(i).

Violation 6:

3) Corrective Action Taken to Avoid Further Violations

The Radiation Safety Officer will keep a weekly log of all radiation safety procedures performed. This will be reviewed by the Chief of Imaging Service on a monthly basis. The Radiation Safety Committee will also review the information to assure that sealed source testing is performed on a timely basis.

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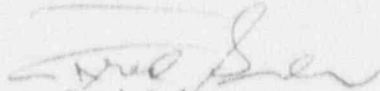
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Response to Notice of Violations - Nuclear Regulatory Agency

4) Date of Full Compliance

The next leak testing will be performed before February 17, 1991. This date will comply with the 6 month time interval as stipulated in 10 CFR 35.59(b).

Sincerely yours,



Fred Salas  
Medical Center Director

Enclosure

Tc / Mo GENERATOR LOG

Manufacturer: \_\_\_\_\_ Lot (Batch) No: \_\_\_\_\_ Date Received: \_\_\_\_\_  
 Calibration Date/time: \_\_\_\_\_ Expiration Date: \_\_\_\_\_ Package Cond: \_\_\_\_\_

Radiation Surveys

Incoming

DIRECT RADIATION: At surface: \_\_\_\_\_ mR/hr; At 3 ft: \_\_\_\_\_ mR/hr; Survey Inst: \_\_\_\_\_  
 REMOVABLE CONTAMINATION: Swipe count: \_\_\_\_\_ cpm - bkg count: \_\_\_\_\_ x Eff. \_\_\_\_\_ = \_\_\_\_\_ dpm; Inst: \_\_\_\_\_  
 Date of Survey: \_\_\_\_\_; Surveyor's initials: \_\_\_\_\_

Outgoing

DIR. RAD: At sur: \_\_\_\_\_ mR/hr; At 3 ft: \_\_\_\_\_ mR/hr; Survey Inst. \_\_\_\_\_; T.I: \_\_\_\_\_  
 REMOVABLE CONTAMINATION: Swipe count: \_\_\_\_\_ cpm - bkg count: \_\_\_\_\_ cpm x Eff. \_\_\_\_\_ = \_\_\_\_\_ dpm; Inst: \_\_\_\_\_  
 Date of Survey: \_\_\_\_\_; Surveyor's Initials: \_\_\_\_\_; Date shipped: \_\_\_\_\_

Date	Time	Tc-99m Assay			Mo-99 Assay			Al (+++)	Initials
		mCi	ml	mCi/ml	uCi	Bkgrnd	uCi-Mo/ mCi-Tc		