



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406

JAN 18 1991

Docket No. 030-03196  
CAL No. 1-91-001

St. Agnes Medical Center  
ATTN: James M. Wilson  
Executive Vice President/  
Chief Operation Officer  
1900 South Broad Street  
Philadelphia, Pennsylvania 19145

Gentlemen:

Subject: Confirmatory Action Letter No. 1-91-001

On January 8-9, 1991, Mrs. Teresa H. Darden and Ms. Penny Nessen of this office conducted an inspection of NRC licensed activities at the above addressed facility. Several weaknesses and apparent violations of NRC requirements relative to the implementation of your radiological safety program were identified. The identified problems/violations indicate a need for additional radiological safety program oversight at your facility. The apparent violations will be described in detail in subsequent correspondence.

Pursuant to a telephone conversation between you and Dr. Mohamed Shanbaky of this office on January 17, 1991, it is our understanding that you have taken or will take the following actions, which will be completed by the dates specified:

1. Provide formal radiological safety training to your Radiation Safety Officer (RSO). The training will include all applicable regulatory requirements governing medical use of radioactive material (i.e. 10 CFR 19, 20, and 35), radiological safety hazards associated with the use and storage of radioactive material, and appropriate radiological safety precautions and controls. This training will include successful completion of an appropriate radiological safety course provided by an accredited university and will be completed by March 31, 1991.
2. Provide radiological safety training to your Nuclear Medicine Technologists (NMT) to include NRC license requirements, 10 CFR 19, 20, and 35, Regulatory Guide 10.8, use of instrumentation, and appropriate radiological safety precautions during routine and emergency operations. Appropriate methods will be used to verify the effectiveness of this training. This training will be completed by February 28, 1991.
3. Review and revise, as necessary, your Nuclear Medicine procedures including all radiological safety procedures. The revised procedures will eliminate inaccuracies, inconsistencies, and conflicts within and between procedures. Your procedural upgrade will provide for clear and detailed instructions addressing all day-to-day operations and potential emergency situations. This procedural revision and upgrade will be completed by April 30, 1991.

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4. Perform a comprehensive program audit by March 31, 1991, the results of which will be reviewed by your Radiation Safety Committee within 7 days from the completion of the audit. The audit findings will be addressed in writing, corrective actions will be completed in a timely manner, and a copy of this audit and scheduled corrective actions provided to this office by April 30, 1991.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget, as required by the Paperwork Reduction Act of 1980, Pub L. 96-511. In accordance with 10 CFR 2.790(a), a copy of this letter will be placed in the NRC Public Document Room.

Issuance of this Confirmatory Action Letter does not preclude the issuance of an Order formalizing the above commitments. If your understanding differs from that set forth above, please call me immediately.

Sincerely,

Original Signed By:  
Ronald R. Bellamy



Richard W. Cooper, Deputy Director  
Division of Radiation Safety  
and Safeguards

cc:  
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Nuclear Safety Information Center (NSIC)  
Commonwealth of Pennsylvania

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