

FEB 14 1991

Borgess Medical Center
 ATTN: Georgiann Ellis
 Vice President
 1521 Gull Road
 Kalamazoo, MI 49001

License No. 21-12275-01
 License No. 21-12275-02

Gentlemen:

This refers to the routine safety inspection conducted by Ms. C. C. Casey of this office on January 15, 1991 of activities authorized by NRC Byproduct Material Licenses No. 21-12275-01 and No. 21-12275-02 and to the discussion of our findings with Mr. Lou Cunningham at the conclusion of the inspection.

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, independent measurements, and interviews with personnel.

In addition to the above areas, the inspector examined actions described in your letter dated January 26, 1990, regarding apparent violations found during our December 4, 1989, 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. A written response is required.

In addition to the specific violations identified, we are concerned about your apparent 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. Further, we are concerned that your Radiation Safety Officer (RSO) is not devoting enough time to managing the radiation safety program. Your RSO, Dr. Van de Riet, indicated to our inspector that he is only able to spend five percent of his time functioning as the RSO for your nuclear medicine/nuclear cardiology programs, due to his other commitments as a physicist. Therefore, in your response to this letter, please address the actions you will take to improve your management oversight in these areas with specific emphasis on increasing the amount of time your current RSO is devoting to your licensed programs.

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During the inspection, one other item identified in your radiation safety program appeared to be in violation of NRC requirements. This violation concerned the failure of your Radiation Safety Committee to establish a quorum on July 10, 1990, as evidenced by the absence of your RSO. The inspection showed that actions are being taken to correct the identified violation and to prevent recurrence. Consequently, we have exercised our discretion as allowed under the NRC Enforcement Policy. Because we want to encourage prompt self-identification and correction of problems, the violation is not being cited because the criteria specified in 10 CFR Part 2, Appendix C, Section V.G. of the Enforcement Policy were satisfied.

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/DCB (RIDS)

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Casey

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Carreno

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Grobe

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