

Holy Family Hospital  
and Medical Center

70 East Street, Methuen, Massachusetts 01844 (508) 687-0151  
Fax (508) 688-7689

October 31, 1990

United States Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, Pennsylvania 19406

ATTENTION: Thomas K. Thompson and James P. Dwyer


Gentlemen:

This is in response to your letter of October 3, 1990 regarding inspection of Holy Family Hospital and Medical Center, License Nos. 20-13916-01 and 20-13916-02; Docket Nos. 030-13728 and 030-00247.

- A.
1. (1) The nuclear medicine technologists have been instructed that all radioactive material must be disposed of in designated, labelled and properly shielded receptacles.
  - (2) The Laboratory will ensure that adequate receptacles are available, and the Nuclear Medicine Supervisor will ensure that they are regularly emptied and that radioactive material will be properly discarded.
  - (3) The date of compliance was June 28, 1990.
- 2.
- (1) The nuclear medicine technologists have been instructed that prior to transfer of a waste storage container to the decay-in-storage area, a tag be affixed to the container which identifies the date sealed, the longest lived radioisotope in the container and the initials of the person sealing the container.
  - (2) The waste storage area will be inspected by the Laboratory Staff on a regular basis, and the Supervisor has been advised of his responsibility in ensuring that all radiation waste is properly identified, dated and sealed.
  - (3) The date of compliance was June 28, 1990.
- B.
- (1) The Radiation Safety Officer will ensure that all individuals working in a restricted area are instructed in the precautions and procedures to minimize exposure to radioactive materials.
  - (2) No untrained person will be allowed to work in the Nuclear Medicine Department during non-routine hours without an escort. The Head of Hospital Engineers has been advised of this requirement by the Radiation Safety Officer.
  - (3) The date of compliance was June 28, 1990.

A division of Valley Regional Health System, Inc.

Member hospital, Caritas Christi, a Catholic health care system



9102060193 910128  
REG1 LIC30  
20-13916-01 PDR

NOV 05 1990

United States Nuclear Regulatory Commission, October 31, 1990, Page 2.

- C. (1) The nuclear medicine technologists have been instructed that they must survey for removable contamination once each week all areas where radiopharmaceuticals are routinely prepared for use, administered or stored.
- (2) The surveys will be performed and the data properly recorded. This responsibility will be reviewed on a regular basis by both the Nuclear Medicine Supervisor and the Radiation Safety Officer.
- (3) The date of compliance was June 28, 1990.
- D. (1) It is understood that a quorum of at least half of the members of the Radiation Safety Committee, including the Radiation Safety Officer and management's representative be present for the Committee to conduct business.
- (2) Administration has been advised that management's representative must be in attendance for all Radiation Safety Committee meetings.
- (3) The date of compliance was June 28, 1990.
- E. (1) It is understood that the spilled gas clearance time and safety measures to be instituted in the event of a spill must be posted.
- (2) The technologists have been instructed that these protocols must be posted, and in the event of a spill must be followed.
- (3) The date of compliance was June 28, 1990.
- F. (1) The Department of Nuclear Medicine utilizes only "instant"  $^{99m}\text{Tc}$ . The Nuclear Regulatory Commission allows that the lowest reading for the linearity test under these circumstances to be that of the lowest accuracy source. Henceforth, the linearity test will be performed to the activity of the lowest accuracy.
- (2) The nuclear medicine technologists have been advised that all linearity tests must be performed to the limit of the lowest accuracy if "instant"  $^{99m}\text{Tc}$  is used or 10 microcuries if a  $^{99\text{m}}\text{Tc}/^{99\text{m}}\text{Tc}$  is used.
- (3) The date of compliance was June 28, 1990.
- G. (1) Records of quarterly dose calibration linearity tests now include the model and serial numbers of the dose calibrator and the calculated activities and the signature of the Radiation Safety Officer.
- (2) The nuclear medicine technologists have been instructed that this information must be included on all linearity tests and that further items of non-compliance of this nature will not be tolerated.
- (3) The date of compliance was June 28, 1990.
- H. (1) All labels will be obliterated prior to disposal.
- (2) The nuclear medicine technologists have been instructed that further items of non-compliance of this nature will not be tolerated.
- (3) The date of compliance was June 28, 1990.

United States Nuclear Regulatory Commission, October 31, 1990, Page 3.

- I. (1) When a brachytherapy source was removed from storage the total activity taken was recorded in the brachytherapy log book.
- (2) A new recording format will be created to list the number of brachytherapy sources and activity taken, number and activity of sources in storage after the removal, the number of sources returned to storage, and the number of sources in storage after the return.
- (3) The date of compliance was October 30, 1990.
- J. (1) The total activity currently in stock was recorded in the quarterly brachytherapy inventory.
- (2) A new form will be created for the quarterly inventory records of brachytherapy sources which will contain the model number of each source, the nominal activity of each source, and the signature of the Radiation Safety Officer.
- (3) The date of compliance was October 30, 1990.
- K. (1) Records of disposal of byproduct material held for decay-in-storage includes the survey instrument used, the background dose rate and the name of the individual who performed the disposal.
- (2) The nuclear medicine technologists have been instructed that this data be recorded each time radioactive material is disposed of.
- (3) The date of compliance was June 28, 1990.

Sincerely,

*William Lane/dolc*

William L. Lane  
President/Chief Executive Officer

*Robert J. Cross*

Robert J. Cross, M.D.  
Radiation Safety Officer

NOV 01 1990