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**SILRO, INC.**

*Frieda Silva de Roldán, M. D.*  
*President*



June 5, 1992

U.S. NUCLEAR REGULATORY COMMISSION  
REGION 11  
101 MARIETTA ST., N.W.  
ATLANTA, GEORGIA, 30323

Re: Lic 52-19112-01  
Docket No:030-16083

Dear Sirs:

This is a reply to your letter dated May 10, 1992 concerning a Notice of Violation of NRC requirements identified during the past safety inspection conducted on April 1, 1992:

Violation A: It was a misunderstanding of 10 CFR-35.251a)-1 thinking that the Radiation Physics Consultant could be a representative of the Radiation Safety Officer (RSO).

Starting immediately no Radiation Safety Committee meeting will be held without the presence of the RSO.

Violation B: when an I-131 therapy treatment is being performed, nurses and paramedical personnel can be inside the patient's room just for a total time of 5 to 10 minutes during each treatment. Average radiation levels are up to 10mR/hr for the first day, and those treatments are very few in the institution. For that reason, it was not considered necessary to assign individual dosimetry devices, but to make available two or three film badges to be used by the personnel entering the patient's room. In the event of recording any overexposure to radiation, with the list of individuals using those badges and noting the frequency and dates of use, it could be easy to identify the person involved.

The Radiation Safety Committee and The Hospital Administration considered in their last meeting that in-hospital radiiodine treatment procedure are not cost-effective, and recommended to discontinue the practice of any therapeutic dose of I-131 greater than 300Ci. This rule will be effective immediately.

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52-19112-01 PDR

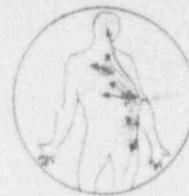
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PAE 1

Violation of Violation 1 is contested. Please find enclosed copy of our letter dated June 27, 1990 on the subject. RI report No. 52-19112-01/90-01. We understood you found satisfactory the procedures (see annex I enclosed) for calculating the MDA of our GM Survey Meter used as a radioactivity counting system for wipe test samples evaluation.

Since we are still using the same instrument and the background of the laboratory is more or less constant, i.e., 10-15 cpm, it was not considered necessary to recalculate the MDA again. Annex I enclosed contains recent calculations of the MDA dated May 29, 1992.

Hoping to answer all the questions. We will be available for any additional information.

Sincerely yours,

Frieda Silva de Roldán, M.D.  
Radiation Safety Officer  
Nuclear Medicine Laboratory