



## LAWRENCE & MEMORIAL HOSPITAL

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December 22, 1993

Jenny M. Johansen, Chief  
Medical Inspection Section  
Division of Radiation Safety and Safeguards  
U S Nuclear Regulatory Commission Region 1  
475 Allendale Road  
King of Prussia, Pennsylvania 19406-1415

Dear Ms. Johansen:

This letter refers to the letter and notice of violation which we received following an inspection of our activities carried out under our U S NRC License No. 06-09261-01. The Docket No. is 030-01275.

The following statements are in response to Appendix A, Notice of Violation. The paragraph letters correspond to the letters in that Notice.

- A. We believe that the survey meters have been appropriately calibrated on an annual basis. The  $^{99m}\text{Tc}$  source used for calibration are calibrated against NIST-traceable sources by the vendor who supplies them. The requirement for the use of  $^{137}\text{Cs}$  or  $^{60}\text{Co}$  sources with multimillicurie activities seems inappropriate for small medical institutions in several respects: first, the radiation exposure to personnel during calibration would be unnecessarily high; second, the survey meter would not be calibrated at the most common gamma-ray energy used in medical licensed activities (140 keV). Finally, the expense and inconvenience of acquiring a substitute meter during expensive off-site calibration is an unnecessary burden for small hospitals. Nevertheless, with regard to survey meter calibration, we will seek the services of a licensed provider of these services, or establish and implement the model procedure that was published in Appendix B to Regulatory Guide 10.8, Revision 2.
- B. Annual tests of dose calibrator accuracy tests will be reviewed and signed by the Radiation Safety Officer. This was simply an oversight.

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All these corrective steps have been accomplished as of December 10, 1993. The RSO will monitor performances of each of the items A and B, above.

We intend to maintain all of our activities under our NRC license in full compliance with all the terms and conditions of the license.

Sincerely,

*Peter M. Molloy M.D.*

Peter M. Molloy, M.D.  
Radiation Safety Officer

/dd