

FEB - 9 1994

Docket No. 030-19066

License No. 06-19661-01MD

Syncor International Corporation
ATTN: Victor A. Calonico, RPh
RSO/BCNP
Glastonbury Corporate Center Four
628 Hebron Avenue
Glastonbury, Connecticut 06033

Dear Mr. Calonico:

Subject: Routine Inspection No. 030-19066/93-001


This letter refers to your December 28, 1993 correspondence, in response to our December 7, 1993 letter.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

No reply to this letter is required. Thank you for your cooperation in this matter.

Sincerely,

Original Signed By:
Ronald R. Bellamy

 Charles W. Hehl, Director
Division of Radiation Safety
and Safeguards

cc:
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
State of Connecticut

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RETURN ORIGINAL TO
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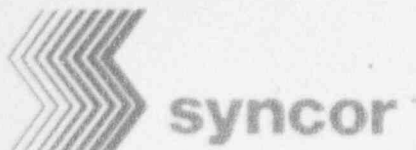
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To: U.S. Nuclear Regulatory Commission,
ATTN: Regional Administrator, Region 1
Washington, D.C. 20555

From: Victor A. Calonico
Docket No. 030-19066
License No. 06-19661-01MD
EA No. 93-286

Re: Reply to a Notice of Violation
NRC Inspection Report No. 030-19066/93-001

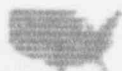
Date: 12/28/93-Tuesday

VIOLATION A: 10 CFR 20.207

Reason for Violation: I-131 contaminated waste contained within a ziploc bag with an exposure rate of 17 milli-Roentgen per hour, at contact with the surface, was mistakenly and improperly discarded in the trash. Our investigation later determined that an alternate janitor from our usual one inadvertently removed the bag containing the waste, being held for decay, from the iodine compounding area, and discarded it in the corporate park's compactor trash. This janitor had not been trained in restricted area cleaning and procedures.

- Corrective steps that have been taken and results achieved.
- All radioactive trash held for decay is marked with a distinctive radioactive symbol to distinguish it from ordinary trash.
- Instruction of Appropriate Janitorial Staff in restricted area procedures, including assurance that radioactive trash stored in properly marked containers is not removed by them.
- Procedures installed to insure that only properly trained janitorial staff members are permitted access to the restricted area.
- Train all members of the pharmacy staff to be aware of all the aforementioned conditions.

JAN 12 1994



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- Corrective steps taken to avoid further violations.

All janitorial personnel have been appropriately trained in restricted area cleaning, precautions, and procedures pertaining to their duties, and this has been documented, and signed by them. All pharmacists, the manager, the day dispatcher, laboratory technician, and our administrative person are also informed on these procedures, as well as, the identity of the two janitors who are eligible for admittance into the restricted area, and have signed documentation attesting to this fact. Additionally, all Syncor personnel at the location have been instructed in the procedure to follow for disposal of trash from the restricted area, and have signed documentation evidencing their awareness of this requirement.

- Date of full compliance.

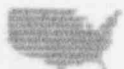
Retroactive to 07/28/1993, and henceforth.

VIOLATION B: Condition 19 of License No. 06-19661-01MD

Reason for Violation: Turnover of personnel with failure to instruct the personnel in the conditions of the license.

- Corrective steps that have been taken and results achieved.

All personnel who handle radioactive waste have been trained appropriately, and currently no waste qualifies for disposal that has not been held for twelve half lives. All sealed waste is now labeled indicating the "Date Sealed" along with the minimum "Date to Discard" which reflects the twelve half lives consideration. On, or after, the "Date to Discard" the waste is measured with a low level survey meter in a low background area, and if the waste reads at background it is then eligible for appropriate disposal. It has been brought to my attention that a corporate directive had previously been sent to all NRC licensed facilities notifying them that radioactive waste must be held for ten half lives and read background levels when measured with a low level survey meter in a low background area. Additionally, because this is a repeat violation a memo concerning this violation will be sent out again to all Syncor locations. Currently our entire radioactive waste storage, and disposal system is being vigorously reviewed for improvements.



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- Corrective steps taken to avoid further violations.

All radioactive waste will be labeled with the "Date Sealed" and the minimum "Date to Discard" which will include a period of twelve half lives for all radioisotopes, prior to eligibility for disposal as non-radioactive waste.

- Date of full compliance.

Retroactively to 11/29/1993 and henceforth

NOTE: Corporate will be working with the company computer center (EDP) to create a waste form which will not allow waste disposal information to be entered into the form unless the material has been held for 12 half lives. When the waste bin is closed the date when 12 half lives have elapsed will be entered on the form and the computer will not allow disposal information for that bin to be entered until that date has been reached or exceeded. This will be implemented company wide.

VIOLATION C: 10 CFR 30.

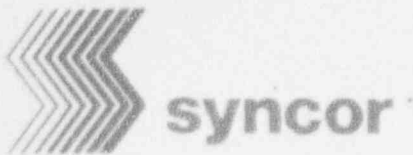
Reason for Violation: During November and December of 1992 we delivered technetium-99m byproduct material to Cameo Diagnostic Centre Inc. at an unauthorized location of use pursuant to their existing specific license issued by the Commission or Agreement State. Specifically, Cameo Diagnostic Centre, Inc. license authorized location at the time was 110 Maple Street, Springfield, Massachusetts, versus the unauthorized location of use, that we at that time transferred technetium-99m, byproduct material to, at 155 Maple Street, Springfield, Massachusetts.

- Corrective steps that have been taken and results achieved.

All client licenses have been reviewed and verified for correct addresses and no radiopharmaceuticals are being sent to an address other than the address which appears on the clients license.



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- Corrective steps taken to avoid further violations.

Training has been provided to Customer Service Representatives (CSAs) to ensure that radiopharmaceuticals are delivered to the proper location. Training has been provided to pharmacy personnel to increase their awareness of the need to verify the correct delivery address. Product delivery manuals (instruction for client delivery) will be updated to include the address listed on the clients license.

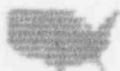
- Date of full compliance.

Retroactively to 11/29/1993 and henceforth

Sincerely,

Victor A. Calonico RPh, RSO, BCNP

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