ST. LOUIS, MISSOURI

DIVISION OF RADIATION HAZARDS SUITE 307 4511 FOREST PARK BLVD. ST. LOUIS, MO. 63108

December 7, 1982

D. G. Wiedeman, Chief Materials Radiation Protection Section 1 U.S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, IL 60137

Re: USNRC licenses 24-00167-11, 24-00063-08, 24-00063, 10 and 24-00063-11.

Dear Mr. Weideman:

This correspondence is in reply to the letter from you dated November 9, 1982 concerning a notice of violation that had been identified during the routine safety inspection conducted by Mr. R. E. Burgin of your office during the period October 19 - 26, 1982.

The notice of violation specifies several instances in which the frequency criterion of "not to exceed six months" for the testing of sealed sources had not been satisfied. Our reply addresses each specified instance as follows:

(1) License 24-00063-10. The cobalt-60 teletherapy source at Jewish Hospital was not leak tested between January and September of 1979 (8 months), September 1979 and April 1980 (7 months), nor April and November, 1980 (7 months).

Corrective action and compliance status. This source is leak tested by the Washington University School of Medicine Division of Radiation Oncology (Physics Section) under the supervision of Glenn Glasgow, Ph.D. The frequency criterion has been fulfilled since Dr. Glasgow re-assigned the testing duty in 1980. In addition, Dr. Glasgow has stressed to the individual currently performing the test, Mr. Richard Keys, the importance of fulfilling the license commitment. The licensee has been in compliance with respect to the testing of this sealed source since November 1980.

(2) License 24-00167-11. The brachytherapy sources at the Mallinckrodt Institute of Radiology were not tested between January and September 1979 (8 months) and the brachytherapy sources at Jewish Hospital were not tested between February and October 1979 (8 months) nor October 1979 and May 1980 (7 months).

Corrective action and compliance status. The duty of testing these sources was assigned to Mr. Mark Haenchen, a health physicist employed in the WU Radiation Safety group, upon his employment in

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September 1981. Since that date the University has fulfilled the frequency of testing criterion for all of the sources assigned to him. I am enclosing a schedule of the approximately 300 sources that are tested by Mr. Haenchen (refer to attachment #1). In addition, two other members of the WU Radiation Safety staff, Mrs. Schaffner and Mrs. Feldhaus, have been assigned back-up responsibility in the testing program in order to ensure satisfaction of the frequency criterion. Full compliance of this license condition has been achieved for these sources since May 1980.

(3) License 24-00167-11. A cesium-137 dose calibrator check source at Jewish Hospital was not leak tested between January and July of 1980, 1981 and 1982 (7 months each).

Corrective action and compliance status. This source has been tested in the past by Stan A. Huber Consultants, Inc. of New Lenox, illinois. Mrs. Janice Baker, CNMT, the Jewish Hospital Nuclear Medicine Supervisor, has agreed to have the WU Radiation Safety group assume the testing responsibility. Two letters dated October 29, 1982 and enclosed as attachment #2 attest to this change. The licensee is currently in compliance.

I am confident that the licensee will avoid further non-compliance in the future with respect to the testing of sealed sources.

Sincerely,

John Eichling, Ph.D. Radiation Safety Officer

JOE/cc

cc: Glenn Glasgow, Ph.D.

Associate RSO

Robert Hickok Assistant Vice Chancellor of Medical Affairs

M. Kenton King, M.D. Dean

Harry Leahey Contract and Grant Administrator

Carlos Perez, M.D. Chairman, Radiation Hazards Committee

Simon Silver, Ph.D. Chairman, Radiological Safety Committee

### Schedule of Testing of Sealed or Plated Sources

#### I. Sources tested by WU Radiation Safety

# Sources requiring testing at intervals not exceeding 6 months

Description of Sealed or Plated Sources Material/Location	No of Sources	Wipe Test to be performed prior to
137 <sub>Cs</sub> sources in the Jewi Hospital Irradiator; Rn. B412	2	12/11/82
60Co, 90Sr & 137Cs brachy- therapy sources of the WU Department of Radiology (Oncology); Cesium Room, West Pavilion	150	12/17/82
WU Radiology (Oncology) 60 Co teletherapy unit; ground floor of MIR	1	12/18/32
Ge (non-by product material) in PETT phantom; 8th floor Rand-Johnson	1	12/28/82
Calibration sources of Jewish Hospital Nuclear Medicine; 2nd floor Jewish Hospital	1	1/12/83
68Ge (non-by product material) in PETT phantoms; 612 MIR	2	1/14/83
Or. Morrison; 3923 South	1	2/04/83
WU Radiation Safety 137Cs calibration source; 154 Busch	1	2/16/82
137 Cs sources in the WU Cancer Biology Irradiator; 4566 Forest Park	2	2/25/83
<sup>3</sup> H target in neutron generator; Hilltop cyclotron	2	3/02/83
Po source in Cahn Electro- balance of Dr. Daughaday; 703 Barnard	1	3/02/83

Calibration sources of WU		
Nuclear Medicine 9th Floor		
Barnes West Pavilion	7	3/23/83
Calibration sources of WU		
Nuclear Medicine Research		0.100.100
7th Floor MIR	3	3/23/83
137 Cs sources in the barnes		
Hospital Irradiator; Blood		//07/00
Bank	2	4/27/83
63Ni source in EC Device of br		
Eli Robbins; 513 Renard	1	4/28/83
90 Sr sources of Dr. Robert		
Walker; Compton Building/		
Hilltop	6	5/15/83
Pu sources of Dr. Wahl;		
Hilltop cyclotron	5	5/15/83
63 <sub>Ni</sub> source in EC Device of		
Dr. Dodson; 555 SLCH	1	5/19/83
137Cs brachytherapy sources of		
Jewish Hospital Radiation Therapy; 2881 Schoenberg	30	5/22/83
Courage resultin	g testing at interva	1.0
	eding 3 months	115
2/1		
Am sources of Dr. Israel;		
164 & 255 Compton Building	50	1/28/83
241 Am sources of Dr. Lowry;		
332 MSB, 3605 CRB & 3949		
South	19	2/10/83
241 <sub>Am &amp;</sub> 1242 <sub>Cm</sub> sources of		
Dr. Walker; Compton Building	8	2/15/83
241 <sub>Am &amp; 243Cm Sources of Dr.</sub>		
Macias; 104 McMillan, Hilltop	2	3/28/83

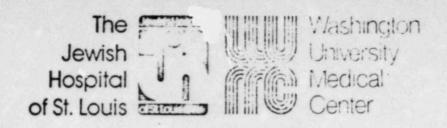
II. Source tested by the WU Department of Radiology (Division of Radiation Oncology) under the supervision of Dr. Glenn Glasgow

## Source requiring testing at intervals not exceeding 6 months

Description of Sealed Source/Location	No. of Sources	Wipe Test to be performed prior to
Jewish Hospital Radiation Therapy <sup>60</sup> Co teletherapy unit; 216 S. Kingshighway	1	5/17/83

#### III. Sources in storage

Description of Sealed Sources/Location	No. of Sources	
WU Radiation Safety 60 Co calibration source; 154	1	
Ni source in EC device of Dr. Baenziger; 4712 West Building	1	
63 <sub>Ni source in EC device (#2)</sub> of Dr. Dodson; 561 SLCH	1	
153 Gd source in BMA; Jewish Hospital Nuclear Medicine	1	



Attachment #2

October 29, 1982

Stan A. Huber Consultants, Inc. 235 Essex Lane
New Lenox, Illinois 60451

Dear Mr. Huber:

On October 26, 1982, Jewish Hospital was inspected by the United States Nuclear Regulatory Commission. The inspector noted that our leak tests of sealed sources were not performed exactly every six months. The dates of our wipes are: 7-9-79, 1-31-80, 7-14-80, 12-19-80, 7-29-81, 1-8-82 and 7-12-82. Our license indicates that we will wipe our sealed sources every six months. We are in non-compliance by delaying the procedure by even one day.

As a result of the findings by the NRC inspector, I have asked that the Department of Radiation Safety of Washington University wipe our sealed sources. Their proximity facilitates control of the leak test dates.

I will continue to use your service to calibrate our instruments. I would like to emphasize the importance of a yearly calibration. As our last calibration date was July 12, 1982, I ask that you set up an appointment to calibrate our instruments on or before July 12, 1983.

Thank you for your attention.

Sincerely,

Janice Baker, CNMT

Supervisor, Nuclear Medicine

CC: John Eichling, Radiation Safety, Washington University

jb/ls

#### SCHOOL OF MEDICINE ST. LOUIS, MISSOURI 63110

DIVISION OF ADIATION HAZARDS BOX 8131

October 29, 1982

To: File

From: Mark Haenchen

Health Physicist M.A.

Re: Sealed sources, Dept. of Muclear Medicine, Jewish Hospital.

Per telephone conversation with Jan Baker on October 28, 1982, the Division of Radiation Hazards has agreed to wipe test all sealed sources in the possession of Jewish Hospital Dept. of Nuclear Medicine, as required by U.S. NRC Materials License No: 24-00167-11 (broad license).

This measure is being taken as a corrective action to prevent reoccurence of violation cited on above license during recent NRC audit.

John Eichling Jan Baker Fran Schaffner