

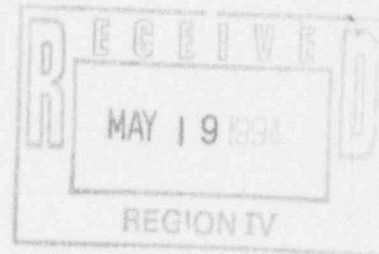
Deaconess
Medical
Center

3002389

May 17, 1994



Mr. L. J. Callan
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011



Re: Docket: 030-0239
License: 25-01051-01
CAL: 4-94-03

Dear Mr. Callan:

This letter is in regard to the Confirmatory Action Letter (CAL) dated May 3, 1994, that was issued to Deaconess Medical Center, License Number 25-01051-01. Deaconess medical Center requests that the CAL be slightly modified to allow expeditious resumption of its brachytherapy program. The justification and proposed modification is as follows.

Justification:

The Corrective Action Letter requires four items to be completed and reviewed by the NRC prior to resumption of routine brachytherapy at Deaconess Medical Center. Item 3 of the CAL requires that "DMC will conduct an audit of all treatment planning programs and methodologies used by its physics consultants" and item 4 requires that "recommendations identified through the above audits... be used to modify the QM program." As you may be aware from the reports of your on-site inspection team the dosimetry of patients treated at Deaconess Medical Center has been performed at three sites, each using a different computer. Deaconess Medical Center does not own and does not have direct administrative control over any of the computers. Each facility acts as a contractor to Deaconess Medical Center through requests for brachytherapy dosimetry as directed by qualified users on our license. The Theratronics computer is located in Billings and is owned by Northern Rockies Cancer Center, the CM computer is located in Casper, Wyoming and is owned by Wyoming Medical Center, and the ARS computer is located in Bozeman, Montana and is owned by Therapeutic Radiology, Inc.

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Mr. L. J. Callan - U.S. Nuclear Regulatory Commission
May 17, 1994
Page 2

All of the actions required by the CAL have been completed with regard to the Theratronics computer. Deaconess Medical Center has received agreement from the same outside consultant who reviewed the Theratronics computer, to conduct the audit of the CMS and ARS computers. However, efforts to secure permission and cooperation from the individuals responsible for the CMS and ARS computers have not met with immediate success. In the best case, it may take several weeks to even secure permission. In the worst case permission may never be received. Ms. Linda Kasner, from your office, is aware of the efforts, to date, to carry out the audit.

Deaconess Medical Center will continue its efforts to carry out all aspects of the CAL, however, in the interest of timely response to the CAL, and in the interest of resuming patient care, we wish to be able to respond to the CAL and resume care on a computer by computer basis. Under this proposed revision, Deaconess Medical Center would perform all required actions and supply all required documentation as previously required, but on a computer by computer basis. The NRC would, presumably, then issue permission to resume brachytherapy treatment planning on a computer by computer basis.

Proposed modification:

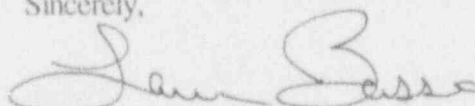
Deaconess Medical Center requests that the Corrective Action Letter be modified by adding an item 5 to the letter as follows:

5. DMC can submit the results of audits and actions required by items 3 and 4 on a computer by computer basis. DMC shall not resume the use of any individual computer until all items of the CAL pertaining to an individual computer have been satisfied.

Should this wording be inappropriate, please change it as you see fit. It is my understanding that, should the NRC agree to this change, a written addendum to the CAL would be issued by your office.

If there are any questions regarding this request, please contact our Radiation Safety Officer, Marc Edwards, Ph.D., or myself. Thank you for your time and consideration.

Sincerely,



Lane Basso
President

cc: Linda Kasner, Senior Radiation Specialist
Radiation Safety Committee File