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The Blood Center
of Southeastern Wisconsin

April 12, 1994

B.J. Holt, Chief
Nuclear Materials Inspection
U.S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

RE: Reply to a Notice of Violation

Dear Ms. Holt:

This is in response to your letter of March 16, 1994, concerning our February 17, 1994, safety inspection. With respect to the violations for License No. 48-02000-01 and License No. 48-02000-02, both of which were failures to calibrate all survey meters annually, our post-inspection analysis revealed two reasons. One was confusion among some members of the radiation safety staff over which survey meters needed to be calibrated. They did not realize that survey meters used in laboratories for monitoring experiments and not used for detecting radioactive contamination required calibration. This issue had actually been identified and clarified shortly before the inspection, but the equipment had not yet been calibrated. The other reason was the loss of a key member of our compliance team in November, 1993, and the subsequent difficulty and delays in replacing him.

Our immediate corrective action was to perform a physical inventory of all survey meters and scaler ratemeters, determine whether or not the equipment was in use, and to update our equipment database. We have sent two instruments out for calibration since our February inspection and expect to have all of our instruments calibrated by the end of May, 1994.

Concerning our longer-term corrective action, The Blood Center recently made a renewed commitment to meeting our compliance requirements by reorganizing and expanding our compliance department. Our reorganization involved the recognition that our safety programs had grown too large to be "tagged on" to existing positions at The Blood Center. This recognition resulted in the creation of a separate Occupational Health and Safety Department which is responsible for employee health and safety and environmental

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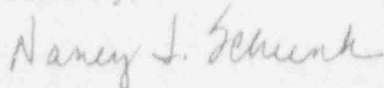
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compliance. This new department will be staffed with two full-time employees, a supervisor and a coordinator. The supervisor, Marc Rhodes, started at The Blood Center on January 17, 1994. We hope to have the Safety Coordinator position filled within the next three weeks.

We are also centralizing and computerizing our Radiation Safety Program records so that we will be able to keep better oversight of the program requirements through the use of various databases with calendar and flagging capacities. We believe that the implementation of these changes will eliminate the type of problem observed in this inspection.

If I can be of further assistance, or if you have any questions, please do not hesitate to contact me at (414) 937-6225.

Sincerely,



Nancy J. Schunk
Radiation Safety Officer
Manager, Quality Assurance
and Safety