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DEPARTMENT OF VETERANS AFFAIRS  
Harry S. Truman Memorial Veterans' Hospital  
800 Hospital Drive  
Columbia MO 65201

APR 13 1994

In Reply Refer To: 543/115

U.S. Nuclear Regulatory Commission  
Region III  
801 Warrenville Road  
Lisle, Illinois 60532-4351

ATTN: John D. Jones  
Acting Chief, Nuclear Materials Inspection Section 2

SUBJ: NRC License No. 24-15235-03  
Docket No. 030-13378

Dear Mr. Jones:

In response to the Notice of Violation dated March 30, 1994, we provide the following reply:

1. Reason for the violation - Our license application dated February 10, 1989, Item 7 named individuals along with their position titles as members of the Radiation Safety Committee. Since this application was submitted, license amendments have been sought to change the chairman and the Radiation Safety Officer on the license. Management and the committee felt that the position titles determined the makeup of the committee and were unaware of the requirement to obtain a license amendment for each individual named.
2. Corrective steps - A license amendment naming each member of the Radiation Safety Committee has been prepared and forwarded to Nuclear Regulatory Commission Materials Licensing section, Region III. The amendment states the voting membership of the committee and includes alternates for management, nursing, research and radiology services. A curriculum vitae for each voting member of the committee and their alternate if applicable are included in the amendment request. Additional non-voting adjunct members will consist of representatives from Medical Service and the University of Missouri, Department of Environmental Health and Safety (Health Physicist).
3. Corrective steps taken to avoid further violations - The Hospital Director appoints the members of the Radiation Safety Committee through publication of hospital administrative issues (numbered memoranda). This medium is used by management as a main avenue of communication to staff, personnel, and organizational elements. The memoranda contain information regarding local instructions, policies, and procedures. One functional series of

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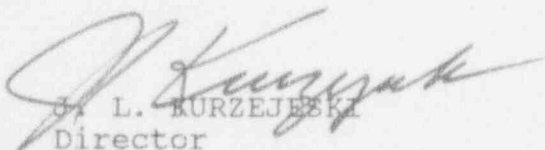
John D. Jones

these numbered memoranda is classified as "Boards & Committees" (B&C) which the Director uses to appoint the Radiation Safety Committee. The current B&C 115-93-25 dated April 26, 1993 entitled "Radiation Safety Committee" will be rewritten to include a statement that membership in the Radiation Safety Committee is by appointment of the Director and approval by the Nuclear Regulatory Commission through a license amendment.

4. Date of full compliance - Full compliance cannot be achieved until a license amendment approval has been received by the hospital. We will request the Materials Licensing section to expedite our license amendment request. The reissue of the B&C designating the Radiation Safety Committee and its duties (B&C 115-94-25) will be reviewed, signed, and published within 60 days. The license amendment request has been submitted and a copy of the letter is enclosed without the supporting curriculum vitae for each committee member. We anticipate that full compliance will be achieved within 90 days from the date of this letter or when the license amendment is received by the hospital.

5. Error in Notice of Violation - "Condition 22.A. of License No. 24-15235-03" cited in your notice of violation authorizes disposal of licensed material by incineration. License condition 26 requires, in part, the licensee to conduct its program in accordance with the statements, representations, and procedures contained in the application dated February 10, 1989. We have assumed the condition number was in error when completing this response.

Sincerely yours,

  
J. L. KURZEJESKI  
Director

Enclosure: Copy of NRC License No. 24-15235-03 amendment letter

cc: Central Region Radiation Safety Program Manager (132/RS)