



Children's
National Medical Center

Department of
Diagnostic Imaging and
Radiology
Children's Hospital
111 Michigan Avenue, N.W.
Washington, D.C. 20010-2970
(202) 884-5080

April 5, 1994

License No. 08-03309-01
Docket No. 030-01323
Inspection No. 030-01323/94-001

Jenny M. Johansen, Chief
Medical Inspection Section
Division of Radiation Safety & Safeguards
US Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Dear Ms. Johansen:

This is in reply to your letter of March 14, 1994 pursuant to the item of noncompliance with NRC regulations and requirements of Children's National Medical Center's license at the time of inspection on February 18, 1994.

On February 18, 1994 construction personnel had used the Pulmonary Medicine Research Laboratory to gain access to a mechanical vertical shaft without prior notification of Radiation Safety. The Director of the Laboratory had been informed.

The following corrective steps have been implemented:

- An Engineering Protocol/Procedure has been formulated and implemented. The protocol requires prior notification and authorization for entry into restricted areas containing radioactive materials.
- All research Directors have been notified in writing of the Engineering Protocol/Procedure. In addition, the responsibility for control of access to radioactive materials has been reemphasized. Specifically, non-authorized personnel must be prohibited from entry into restricted areas. Authorized entry must be supervised by laboratory personnel or all sources must be secured.

Jenny M. Johansen, Chief
April 5, 1994

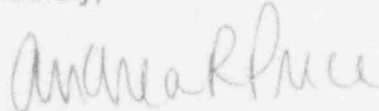
Department of Pediatrics
Department of Radiology
The George Washington University
Medical Center

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We believe that full compliance has been achieved. We have found the NRC inspection of February 18, 1994 to be thorough and an informative contribution to the Radiation Safety Program at Children's National Medical Center. In particular, we would like to commend Mr. Lodhi, for the inspection he performed. It is hoped that this constitutes a satisfactory reply to your recent letter and Notice of Violation.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrea R. Price".

Andrea R. Price
Vice President, Ambulatory & Diagnostic Services

ARP/jmc

Enclosure

cc: Radiation Safety Committee

CHILDREN'S HOSPITAL NATIONAL MEDICAL CENTER
POLICIES AND PROCEDURES

SUBJECT: Engineering Protocol for Facilities Containing Radioactive Materials POLICY NUMBER: SYS 25

DATE ISSUED: 4/7/94 DATE EFFECTIVE: 4/7/94

I. POLICY:

The Engineering Department will support the Radiation Safety Program with regard to compliance with NRC regulations.

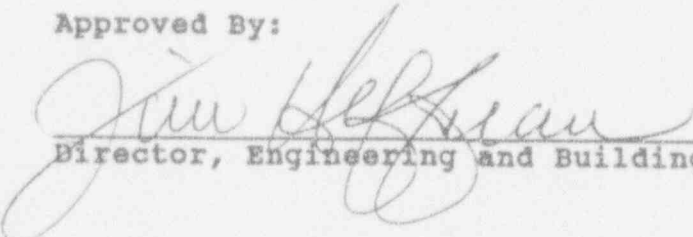
II. PURPOSE:

To ensure security and radiation safety in facilities containing radioactive materials.

III. IMPLEMENTATIONS:

1. All personnel must be authorized by the Director of a laboratory prior to performing work in a laboratory containing radioactive materials. No non-authorized personnel is allowed in the laboratory.
2. All significant modifications or maintenance of a facility containing radioactive material must be authorized by the Radiation Safety Officer or Chairman of the Radiation Safety Committee in addition to the Director of the laboratory at least by 5:00 p.m. of the previous day.
3. All source material will be secured under lock and key unless laboratory personnel are present. Under no circumstances will Engineering personnel handle radioactive materials.
4. Any entry into a lab area designated by "Caution Radioactive Materials" signs, must be authorized.
5. Engineering Department supervisors will schedule the required maintenance at those times made available for maintenance purposes.
6. Prior to the initiation of any work activities the notification form will be completed. These forms will be available in the Control Room.

Approved By:


Director, Engineering and Building Services

4/7/94
Date

ENGINEERING DEPARTMENT
CHILDREN'S HOSPITAL

SUBJECT: Notification for Construction Activities in Areas
Containing Radioactive Work

Description of Work:

Location of Work:

Impact on Unit:

Duration with Dates and Time of work activities:

Requested by: _____ Date: _____

Approved by: _____ Date: _____
Hospital Engineer

Radiation Safety Officer/Chairman of the
Radiation Safety Committee _____ Date: _____

Director of Laboratory _____ Date: _____

Comments: _____

cc: Control Room




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MEMORANDUM

TO: Gordon Avery, M.D., Chief of
Med/Physician in Chief

CRI Directors
Charles Finney, Administrative Director
of Operations
Children's Research Institute

FROM: Thomas Fearon, Ph.D., Radiation Safety 

RE: Security of Radioactive Materials

The Nuclear Regulatory Commission conducted an inspection of Children's National Medical Center on February 18, 1994 during which a violation of NRC requirements was identified. Specifically, we were cited as follows:

"10 CFR 20.1801 requires that the licensee secure from unauthorized removal or access licensed materials that are stored in unrestricted areas. 10 CFR 20.1802 requires that the licensee control and maintain constant surveillance of licensed material that is in an unrestricted area and that is not in storage. As defined in 10 CFR 20.1003, unrestricted area means an area, access to which is neither limited nor controlled by the licensee.

Contrary to the above, on February 18, 1994, the licensee did not secure from unauthorized removal or limit access to 200 microcuries each of carbon-14 and phosphorus-32 located in the Pulmonary Medicine Research laboratory, an unrestricted area, nor did the licensee control and maintain constant surveillance of this licensed material.

This is a Severity Level IV violation. (Supplement IV)"

We are required to provide corrective actions in order to preclude future recurrence.

MEMORANDUM

Gordon Avery, M.D.

April 5, 1994

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Therefore, an Engineering Policy/Procedure has been developed (copy enclosed) that will require the notification of the Director of a laboratory containing radioactive materials of any work to be performed in their facility. It is the responsibility of the laboratory Director to either provide supervision with laboratory personnel and instructions to Engineering personnel as to the sources in the laboratory, their location and potential risks or to secure all radioactive materials under lock and key if personnel are not present or available. Similarly, during normal working hours radioactive materials must be secured from any unauthorized access. This may be implemented by locking the laboratory door when personnel are not present or securing all sources. Under absolutely no circumstances may any unauthorized person be allowed in a facility containing radioactive materials without supervision by laboratory personnel.