

WA. BOADE M.D.,

L I M I T E D

Diagnostic Medical Imaging

JUN 1 1994

May 27, 1994

Samuel J. Collins, Director
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission, Region 4
611 Ryan Plaza Drive
Arlington, TX 76011

License: 40-26908-01
Order: 030.30273

Dear Mr. Collins:

The following is a reply to the NRC inspection report #030 30273/94-01 (Notice of Violation).

VIOLATION:

10 CFR 20.1906 (B) and (C) require that each licensee monitor the external surfaces of a package labeled with a Radioactive White I, Yellow II, Yellow III, for radioactive contamination and radiation levels not later than 3 hours after receipt of the package during the licensee's normal working hours, or not later than 3 hours on the beginning of the next working day if it is received after working hours.

1. The violation occurred because the new 10 CFR 20 requiring wipe tests on all incoming packages as well as the monitoring of these packages was inadvertently left out of the updated company policy manual.
2. The policy manual Section 4 Safely Opening Packages was modified to include wipe tests on all incoming packages containing any radioactive materials. [See attached procedure].
3. Technologists have been instructed to review the policy and immediately implement the changes requiring performance and recording of wipe tests on all incoming shipments of Radioactive materials.
4. Full compliance was achieved May 5, 1994.

Sincerely,

Carlene Connelly
Carlene Connelly
Operations Manager

94-1102

ADMB (IE-07)
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W.A. BOADE M.D., LIMITED
DIAGNOSTIC MEDICAL IMAGING

Procedures For Safely Opening Packages

Special requirements must be followed for packages containing quantities of radioactive material in excess of the Type A quantity limits specified in paragraph 20.205(b) of 10 CFR Part 20 (e.g.; more than 20 curies of Mo-99, Tc-99m, uncompressed Xe-133, or more than 3 curies of Xe-133, I-131, Cs-137, Ir-192, I-125, or more than 0.001 curie of Ra-226). Radioactive shipments will be monitored for external radiation levels and surface contamination within 3 hours after receipt if received during working hours or not later than 3 hours from the beginning of the next working day if received after hours.

A. All packages will be opened using the following procedures:

1. Put on gloves to prevent hand contamination.
2. Visually inspect the package for any sign of damage (e.g., wetness, crushed). If damage is noted, stop procedures and notify the Radiation Safety Officer.
3. Measure exposure at 1 meter from the package surface and record. If the reading is greater than 10 mR/hr, stop the procedure and notify the Radiation Safety Officer.
4. Measure the surface exposure rate and record. If the measurement is greater than 22 mR/hr, stop the procedure and notify Radiation Safety Officer.
5. Do a wipe test of the outer surface of the shipping container. Record the results on the sticker. If the outer surface wipe test shows contamination, or there is any damage to the package, a wipe of the external surface of the final source container should also be done. Acceptable limits are less than 200 dpm for I¹³¹, P³², or Sr⁹⁰, 2200 dpm for Tc^{99m}, or Tl²⁰¹.

6. Open the package with the following precautionary steps:
 - a. Open the outer package (following manufacturer's directions, if supplied) and remove the packing slip.
 - b. Open the inner package and verify that the contents within agree with those items on the packing slip, compare requisitions, packing slip and vial label.
 - c. Check the integrity of the final source container (i.e., inspect for breakage of seals or vials, loss of liquid and/or discoloration of packaging materials).
7.
 - a. Check that the shipment does not exceed possession limits.
 - b. Record all appropriate information on log book or utilization form.
8. Monitor the packing materials and the package for contamination before discarding.
 - a. If contaminated, treat as radioactive waste.
 - b. If not contaminated, obliterate radiation warning labels before discarding in the regular trash.
9. Records of the receipt of Radioactive Materials will be maintained and kept in a 3-ring binder on the bookshelf within the Hot Lab.


RADIATION SAFETY OFFICER

MAY 5, 1994
DATE