

30-19127

pmB  
43-19704-01



# VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

## MEMORANDUM



TO: NUCLEAR REGULATOR' COMMISS. TN  
FROM: VALLEY VIEW MEDICAL CENTER  
DATE: MARCH 17, 1983  
RE: RESPONSE TO NRC INSPECTION

THERE WERE SEVERAL AREAS OF VIOLATION OF COMPLIANCE TO OUR LICENSE. THESE ARE OUR RESPONSES; WE HAD OUR MEDICAL ISOTOPE COMMITTEE MEETING MARCH 16, 1983. THE NOTICE OF VIOLATION WAS REVIEWED AND THESE PROPOSALS WERE SUGGESTED (MINUTES ARE ADDED TO REPORT).

1. 10 CFR 20.207 (A) REQUIRES THAT LICENSED MATERIALS STORED IN AN RESTRICTED AREA SHALL BE SECURED FROM UNAUTHORIZED REMOVAL FROM PLACE OF STORAGE.

A MEMO WAS SENT TO AND DISCUSSED WITH THE DIRECTOR OF PLANT SERVICES ON LOCKING THE DOOR (ADDED TO REPORT). IT WILL BE KEPT LOCKED AND A WEEKLY CHECK WILL BE DONE AS USED GENERATORS ARE BROUGHT THERE. THERE WILL BE AN AREA ADDED TO OUR GENERATOR RECEIVING AND DISPOSAL SHEET TO VERIFY WEEKLY THAT THE DOOR IS LOCKED.

2. FOLLOW PROCEDURES CONTAINED WITHIN ALARA PROGRAM. MEDICAL ISOTOPE COMMITTEE WILL MEET QUARTERLY; DAILY SURVEY OF PREPARATION AND INJECTION AREAS.

A. ALARA PROGRAM -- DR. BARON, OUR RADIOLOGIST SINCE OCTOBER, AND DR. ROBERT EVANS, RSO, HAVE REVIEWED OUR PROPOSED ALARA PROGRAM. A COPY OF THE ANNUAL REVIEW FORM IS ATTACHED.

B. MEDICAL ISOTOPE COMMITTEE MEETING -- EVEN THOUGH OUR LICENSE WAS DATED IN JULY 1981, WE DID NOT HAVE A NUCLEAR MEDICINE SERVICE UNTIL OCTOBER 1981. WE DIDN'T REALIZE ONE WAS NEEDED FOR THE 3RD QUARTER OF 1981. WE STILL WERE LACKING ON THE NUMBER OF FORMAL MIC MEETINGS. WE WILL MAKE SURE THAT OUR MIC MEETINGS ARE HELD QUARTERLY. HOSPITAL ADMINISTRATION AND DR. BARON, WHO IS NOW FULL TIME AT OUR HOSPITAL, WILL ALLOW FOR MORE FLEXIBLE SCHEDULES TO FULFILL OUR QUARTERLY MEETINGS.

C. SURVEY OF ELUTION PREPARATION AND INJECTION AREAS -- A WEEKLY SURVEY WAS BEING DONE, AND THAT HAS BEEN CHANGED TO DAILY AND ADDED TO OUR DAILY FORMS.

8305030303 830317  
NMS LIC30  
43-19704-01 PDR

1E07



## VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

- D. CALIBRATION OF SURVEY INSTRUMENTS -- DWIGHT POTTER, RADIOLOGICAL PHYSICIST, HAS CALIBRATED OUR DOSE CALIBRATOR AND SURVEYED INSTRUMENTS SINCE THE INSPECTION.
- E. MINUTES BE KEPT OF INSERVICE TRAINING MEETINGS HELD ANNUALLY FOR ANCILLARY PERSONNEL -- OUR ORIGINAL MEETING FOR ANCILLARY PERSONNEL WAS HELD IN OCTOBER 1981. A MEMO HAS BEEN SENT TO THE DIRECTOR OF HOUSEKEEPING AND ARRANGEMENT HAS BEEN MADE FOR INSERVICE WITH HOUSEKEEPING PERSONNEL (THE MEMO HAS BEEN ATTACHED). THE DIRECTOR OF HOUSEKEEPING WILL INFORM THE NUCLEAR MEDICINE DEPARTMENT OF NEW EMPLOYEES, AND THE QUARTERLY INSERVICE WILL BE AVAILABLE FOR ANY NEW EMPLOYEES.

WITH THESE ABOVE ITEMS WE FEEL WE ARE NOW IN COMPLETE COMPLIANCE WITH THE NRC GUIDELINES. IF THESE CORRECTIONS OR DOCUMENTATIONS ARE NOT ACCEPTABLE, PLEASE CONTACT US WITH ANY CHANGES OR RECOMMENDATIONS THAT WILL BE NEEDED.

*Dahl T. Gardner*

DAHL GARDNER, ADMINISTRATOR

*Michael A. Baron M.D.*

MICHAEL A. BARON, M.D., RADIOLOGIST

*Wayne Mc Dade R.T.*

WAYNE MCDADE, R.T., CHIEF TECHNOLOGIST

he



# VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

## MEMORANDUM

TO: LES PEER, DIR. OF HOUSEKEEPING

FROM: WAYNE MCOADE, DIRECTOR OF NUCLEAR MEDICINE

DATE: MARCH 17, 1983

RE: INSERVICE OF ANCILLARY PERSONNEL, PERTAINING TO NUCLEAR MEDICINE

AS WE HAVE PREVIOUSLY DISCUSSED WITH THE NRC INSPECTOR, WE ARE REQUIRED TO HAVE AN ANNUAL INSERVICE WITH ALL ANCILLARY PERSONNEL INVOLVED WITH NUCLEAR MEDICINE. IN THE PAST THIS HAS NOT BEEN DONE. I WILL MEET WITH YOUR EMPLOYEES ON APRIL 13, 1983, FOR YOUR NEXT DEPARTMENT MEETING.

I WOULD LIKE TO FOLLOW THIS SCHEDULE TO ORIENT NEW EMPLOYEES IN YOUR DEPARTMENT REGARDING NUCLEAR MEDICINE:

2ND QUARTER: APRIL 13, 1983, 1:00 P.M.

3RD QUARTER: JULY 12, 1983, 1:00 P.M.

4TH QUARTER: OCT. 11, 1983, 1:00 P.M.



## VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

### M E M O R A N D U M

TO: SCOTT HAYCOCK  
FROM: WAYNE MCDANE, DIRECTOR OF RADIOLOGY/NUC, MEDICINE  
DATE: MARCH 17, 1983  
RE: LOCKING OF DOOR FOR STORAGE AREA OF LICENSED RADIOACTIVE MATERIAL

AS WE DISCUSSED EARLIER THIS MONTH OUR SURVEY BY THE NRC NOTED THAT THE DOOR FOR STORAGE OF OUR SPENT GENERATORS WAS NOT BEING KEPT LOCKED.

IN ORDER TO CONFORM WITH NRC GUIDELINES THIS DOOR WILL HAVE TO BE KEPT LOCKED. SINCE THIS AREA HAS LIMITED ACCESS, THE DIRECTOR OF PLANT SERVICES AND HOUSEKEEPING, ALONG WITH THE DIRECTOR OF RADIOLOGY, SHOULD HAVE THE ONLY KEYS. THIS WILL ALLOW FOR COMPLETE CONTROL OF THE STORAGE AREA.



# VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

## MINUTES OF MEDICAL ISOTOPE COMMITTEE MEETING

DATE: MARCH 16, 1983

THOSE IN ATTENDANCE: ROBERT EVANS, M.D., R.S.O., MICHAEL BARON, M.D.,  
RADIOLOGIST, ROGER WILLIAMS, M.D., PATHOLOGIST, DAHL GARDNER, HOSPITAL  
ADMINISTRATOR, WAYNE MCDADE, R.T., CHIEF TECHNOLOGIST

THE NRC INSPECTION WAS REVIEWED AND RECOMMENDATIONS FOR CORRECTIONS  
WERE SUGGESTED.

WAYNE MCDADE READ THROUGH THE INSPECTORS SURVEY. THE DOSE CALIBRATOR AND SURVEY  
INSTRUMENTS HAVE ALREADY BEEN CALIBRATED BY RADIATION PHYSICIST, DWIGHT POTTER.

A MEMO WAS SENT TO SCOTT HAYCOCK CONCERNING LOCKING OF THE USED GENERATOR  
STORAGE AREA, ALONG WITH A MEMO REGARDING INSERVICE FOR ANCILLARY PERSONNEL. DR.  
WILLIAMS SUGGESTED A QUARTERLY INSERVICE BE AVAILABLE TO NEW EMPLOYEES. A  
COMMITMENT BY ADMINISTRATION AND ALL MEMBERS PRESENT WAS MADE TO HOLD QUARTERLY  
MEETINGS. WITH DR. BARON WORKING FULL TIME AT OUR FACILITY, COMPLIANCE SHOULD  
BE EASIER.

WAYNE MCDADE HAS ADDED TO THE DAILY GENERATOR WORK SHEET A DAILY SURVEY OF  
INJECTION AND PREPARATION SITES.

DR. EVANS SUGGESTED A FORM CHECK LIST FOR QUARTERLY REVIEW OF REQUIREMENTS FOR  
ALARA, TO INCLUDE OTHER QUARTERLY RESPONSIBILITIES SUCH AS LINE CLARITY TESTING.

LAST ITEM CONCERNED APPROVAL OF 1123 FOR THYROID SCANNING. ALL PRESENT APPROVED  
THE USAGE.

he



# VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

## PROGRAM FOR MAINTAINING OCCUPATIONAL RADIATION EXPOSURES ALARA AT

VALLEY VIEW MEDICAL CENTER  
CEDAR CITY, UTAH

### 1. VALLEY VIEW MEDICAL CENTER'S COMMITMENT

A. VALLEY VIEW MEDICAL CENTER, IS COMMITTED TO THE PROGRAM DESCRIBED ON THIS PAPER FOR KEEPING EXPOSURES (INDIVIDUAL AND COLLECTIVE) AS LOW AS REASONABLY ACHIEVABLE (ALARA). IN ACCORDANCE WITH THE COMMITMENT, VALLEY VIEW MEDICAL CENTER HEREBY ESTABLISHES AN ADMINISTRATIVE ORGANIZATION FOR RADIATION SAFETY AND DEVELOPS THE NECESSARY WRITTEN POLICY, PROCEDURES AND INSTRUCTIONS TO FOSTER THE ALARA CONCEPT WITHIN OUR INSTITUTION. THE ORGANIZATION WILL INCLUDE A MEDICAL ISOTOPE COMMITTEE (MIC) AND A RADIATION SAFETY OFFICER (RSO). WE ARE ALSO COMMITTED TO FOLLOW THE GUIDANCE PROVIDED BY U.S. NUCLEAR REGULATORY GUIDES 8.10 AND 8.18.

B. VALLEY VIEW MEDICAL CENTER SHALL PERFORM A FORMAL AUDIT ANNUALLY TO DETERMINE HOW EXPOSURES MIGHT BE LOWERED. THIS SHALL INCLUDE REVIEWS OF OPERATING PROCEDURES AND PAST EXPOSURE RECORDS, INSPECTIONS, ETC., AND CONSULTATIONS WITH THE RADIATION PROTECTION STAFF OF UTAH VALLEY HOSPITAL OR OUTSIDE CONSULTANTS. A BRIEF SUMMARY OF THE AUDIT WILL BE PREPARED COVERING THE SCOPE OF THE REVIEW AND CONCLUSIONS REACHED.

C. MODIFICATION TO OPERATING AND MAINTENANCE PROCEDURES AND TO EQUIPMENT AND FACILITIES WILL BE MADE WHERE THEY WILL SIGNIFICANTLY REDUCE EXPOSURES AT REASONABLE COSTS. VALLEY VIEW MEDICAL CENTER WILL BE ABLE TO DEMONSTRATE THE IMPROVEMENTS HAVE BEEN SOUGHT, MODIFICATIONS HAVE BEEN CONSIDERED, AND THEY HAVE BEEN IMPLEMENTED WHERE PRACTICABLE. WHERE MODIFICATIONS HAVE BEEN CONSIDERED BUT NOT IMPLEMENTED, VALLEY VIEW MEDICAL CENTER WILL BE PREPARED TO DESCRIBE THE REASONS FOR NOT IMPLEMENTING THEM.

D. IN ADDITION TO MAINTAINING DOSES TO INDIVIDUALS AS FAR AS BELOW THE LIMITS AS IS REASONABLY ACHIEVABLE, THE SUM OF THE DOSES RECEIVED BY ALL EXPOSED INDIVIDUALS WILL ALSO BE MAINTAINED AT THE LOWEST PRACTICABLE LEVEL. IT WOULD NOT BE DESIRABLE, FOR EXAMPLE, TO HOLD THE HIGHEST DOSES TO INDIVIDUALS TO SOME FRACTION OF THE APPLICABLE LIMITS IF THIS INVOLVED EXPOSING ADDITIONAL PEOPLE AND SIGNIFICANTLY INCREASING THE SUM OF RADIATION DOSES RECEIVED BY ALL INVOLVED INDIVIDUALS.

### 2. MEDICAL ISOTOPE COMMITTEE (MIC)

#### A. REVIEW OF PROPOSED USERS AND USES

1. THE MIC SHALL THOROUGHLY REVIEW THE QUALIFICATIONS OF EACH POTENTIAL AUTHORIZED USER WITH RESPECT OF THE TYPES AND QUANTITIES OF MATERIALS AND USES FOR WHICH HE/SHE HAS APPLIED TO ASSURE THE USER WILL BE ABLE TO TAKE APPROPRIATE MEASURES TO MAINTAIN ALARA.



## VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

2. WHEN CONSIDERING A NEW USE OF BY-PRODUCT MATERIAL, THE MIC WILL REVIEW THE EFFORTS OF THE AUTHORIZED USER TO MAINTAIN EXPOSURE ALARA. THE USER SHOULD HAVE SYSTEMATIZED PROCEDURES TO ENSURE ALARA AND SHOULD HAVE CONSIDERED THE USE OF SPECIAL EQUIPMENT SUCH AS SYRINGE SHIELDS, RUBBER GLOVES, LEAD APRONS, PORTABLE SHIELDS, ETC., IN HIS/HER PROPOSED USE.

3. THE MIC SHALL ENSURE THAT THE USER JUSTIFIES HIS PROCEDURES AND THEY WILL RESULT IN ALARA DOSES (INDIVIDUAL AND COLLECTIVE).

4. ALL FUNCTIONS OF THIS COMMITTEE ARE SHOWN IN ITEM 7 A OF THE NRC LICENSE APPLICATION.

B. DELEGATION OF AUTHORITY (THE JUDICIOUS DELEGATION OF THE MIC AUTHORITY IS ESSENTIAL TO THE ENFORCEMENT OF AN ALARA PROGRAM).

1. THE MIC SHALL DELEGATE SUFFICIENT AUTHORITY TO THE RSO FOR ENFORCEMENT OF THE ALARA CONCEPT (ITEM 8 OF NRC LICENSE APPLICATION).

2. THE MIC SHALL SUPPORT THE RSO IN THOSE INSTANCES WHERE IT IS NECESSARY FOR THE RSO TO ASSERT HIS AUTHORITY. WHERE THE RSO HAS BEEN OVERRULED, THE COMMITTEE WILL RECORD THE BASIS FOR ITS ACTION. THE RSO IS TO HAVE DIRECT ACCESS TO THE HOSPITAL ADMINISTRATOR IF HE FEELS THE MIC OVERRULING WILL RESULT IN ANY UNWARRANTED PERSONNEL EXPOSURES.

C. REVIEW OF ALARA PROGRAM

1. THE MIC SHALL ENCOURAGE ALL USERS TO REVIEW CURRENT PROCEDURES AND DEVELOP NEW PROCEDURES AS APPROPRIATE FOR WAYS TO IMPLEMENT THE ALARA CONCEPT.

2. THE MIC SHALL PERFORM A QUARTERLY REVIEW OF OCCUPATIONAL RADIATION EXPOSURE WITH PARTICULARLY ATTENTION TO INSTANCES WHERE INVESTIGATIONAL LEVELS IN TABLE 1 (PAGE 4) ARE EXCEEDED. THE PRINCIPLE PURPOSE OF THIS REVIEW IS TO ASSESS TRENDS IN OCCUPATIONAL EXPOSURE AS AN INDEX OF THE ALARA PROGRAM QUALITY AND TO DECIDE IF ACTION IS WARRANTED WHEN INVESTIGATIONAL LEVELS ARE EXCEEDED. (PAGE 4)



## VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

3. THE MIC WILL EVALUATE VALLEY VIEW MEDICAL CENTER'S OVERALL EFFORTS FOR MAINTAINING EXPOSURES ALARA ON AN ANNUAL BASIS. THIS REVIEW WILL INCLUDE THE EFFORTS OF THE RSO, AUTHORIZED USERS, AND WORKERS.

### 3. RADIATION SAFETY OFFICER (RSO)

#### A. ANNUAL AND QUARTERLY REVIEW

1. ANNUAL REVIEW OF RADIATION SAFETY PROGRAM. THE RSO WILL PERFORM AN ANNUAL REVIEW OF THE RADIATION SAFETY PROGRAM FOR ADHERENCE TO ALARA CONCEPTS. REVIEWS OF SPECIFIC PROCEDURES MAY BE CONDUCTED ON A MORE FREQUENT BASIS.

2. QUARTERLY REVIEW OF THE OCCUPATIONAL EXPOSURES. THE RSO SHALL REVIEW AT LEAST QUARTERLY THE EXTERNAL RADIATION EXPOSURES OF AUTHORIZED USERS AND WORKERS TO DETERMINE THAT THEIR EXPOSURES ARE ALARA IN ACCORDANCE WITH THE PROVISIONS MENTIONED IN PARAGRAPH 6 (PAGE 4) OF THIS PROGRAM.

3. QUARTERLY REVIEW RECORDS OF RADIATION LEVEL SURVEYS. THE RSO SHALL REVIEW RADIATION LEVELS IN UNRESTRICTED AND RESTRICTED AREAS TO DETERMINE THE ALARA LEVELS DURING THE PREVIOUS QUARTER.

#### B. THE RSO'S EDUCATION RESPONSIBILITIES FOR AN ALARA PROGRAM

1. THE RSO SHALL SCHEDULE BRIEFINGS AND EDUCATIONAL SESSIONS TO INFORM WORKERS OF ALARA PROGRAM EFFORTS.

2. THE RSO SHALL ENSURE AUTHORIZED USERS, OCCUPATIONAL WORKERS AND ANCILLARY PERSONNEL UNDERSTAND THE ALARA PHILOSOPHY AND KNOW THAT THE MIC AND THE RSO ARE COMMITTED TO IMPLEMENTING THE ALARA CONCEPT.

C. COOPERATIVE EFFORTS FOR DEVELOPMENT OF ALARA PROCEDURES. INDIVIDUALS WHO MUST WORK WITH ALARA CONCEPTS WILL BE GIVEN OPPORTUNITIES TO PARTICIPATE IN FORMULATION OF THE PROCEDURES THAT THEY WILL BE REQUIRED TO FOLLOW.

1. THE RSO SHALL MAINTAIN CLOSE CONTACT WITH ALL USERS AND WORKERS IN ORDER TO DEVELOP ALARA PROCEDURES FOR WORKING WITH RADIOACTIVE MATERIALS.

2. THE RSO SHALL ESTABLISH PROCEDURES FOR RECEIVING AND EVALUATING SUGGESTIONS OF INDIVIDUAL WORKERS FOR IMPROVING RADIATION SAFETY PRACTICES AND ENCOURAGE THE USE OF THESE PRACTICES.

D. REVIEWING INSTANCES OF DEVIATION FROM GOOD ALARA PRACTICES. THE RSO SHALL INVESTIGATE ALL INSTANCES OF DEVIATION FROM GOOD ALARA PRACTICES AND, IF POSSIBLE, DETERMINE THE CAUSES. WHEN THE CAUSE IS KNOWN, THE RSO WILL PROPOSE CHANGES IN THE PROGRAM TO MAINTAIN EXPOSURES ALARA.





# VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

## 4. AUTHORIZED USERS

### A. NEW PROCEDURES INVOLVING POTENTIAL RADIATION EXPOSURES

1. THE AUTHORIZED USER SHALL CONSULT WITH, AND RECEIVE THE APPROVAL OF, THE RSO AND/OR MIC DURING THE PLANNING STAGE BEFORE USING RADIOACTIVE MATERIALS FOR A NEW PROCEDURE.

2. THE AUTHORIZED USER SHALL EVALUATE THE PROCEDURES BEFORE USING RADIOACTIVE MATERIALS TO ENSURE EXPOSURES WILL BE KEPT ALARA. THIS MAY BE ENHANCED THROUGH APPLICATION OF TRIAL RUNS.

### B. RESPONSIBILITY OF THE AUTHORIZED USER TO THOSE HE/SHE SUPERVISES

1. THE AUTHORIZED USER SHALL EXPLAIN THE ALARA CONCEPT AND HIS COMMITMENT TO MAINTAIN EXPOSURES ALARA TO ALL OF THOSE HE SUPERVISES.

2. THE AUTHORIZED USER SHALL ENSURE THAT THOSE UNDER HIS SUPERVISION WHO ARE SUBJECT TO OCCUPATIONAL RADIATION EXPOSURES ARE TRAINED AND EDUCATED IN GOOD HEALTH PHYSICS PRACTICES AND IN MAINTAINING EXPOSURES ALARA.

### 5. PERSONS WHO RECEIVE OCCUPATIONAL RADIATION EXPOSURES

A. THE WORKER SHALL BE INSTRUCTED IN THE ALARA CONCEPT AND ITS RELATIONSHIP TO HIS WORKING PROCEDURES AND WORK CONDITIONS.

B. THE WORKER SHALL KNOW WHAT RESOURCES ARE AVAILABLE IF HE FEELS THAT ALARA IS NOT BEING PROMOTED ON THE JOB.

### 6. ESTABLISHMENT OF INVESTIGATIONAL LEVELS IN ORDER TO MONITOR INDIVIDUAL OCCUPATIONAL EXTERNAL RADIATION EXPOSURES

A. VALLEY VIEW MEDICAL CENTER, CEDAR CITY, UTAH, HEREBY ESTABLISHES INVESTIGATIONAL LEVELS FOR OCCUPATIONAL EXTERNAL RADIATION EXPOSURE WHICH, WHEN EXCEEDED, WILL INITIATE REVIEW OR INVESTIGATION BY THE MIC AND/OR THE RSO. THE INVESTIGATIONAL LEVELS ADOPTED ARE LISTED IN TABLE 1 BELOW. THESE LEVELS APPLY TO EXPOSURE OF INDIVIDUAL WORKERS.

TABLE 1

	INVESTIGATIONAL LEVELS (MREMS PER CALENDAR QUARTER)	
	LEVEL I	LEVEL II
1. WHOLE BODY; HEAD AND TRUNK; ACTIVE BLOOD-FORMING ORGANS; LENS OF EYES; OR GONADS	125	375
2. HANDS AND FOREARMS; FEET AND ANKLES	1875	5625
3. SKIN OF WHOLE BODY*	750	2250

\* Not normally applicable to nuclear medicine operations except those using significant quantities of beta emitting isotopes.



## VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

THE RADIATION SAFETY OFFICER WILL REVIEW ALL RECORDS OF OCCUPATIONAL EXPOSURE TO IONIZING RADIATION, AND RESULTS OF PERSONNEL MONITORINGS, NOT LESS THAN ONCE IN ANY CALENDAR QUARTER AS REQUIRED BY 10 CFR 20. 20.401. THE FOLLOWING ACTIONS WILL BE TAKEN AT THE INVESTIGATIONAL LEVELS AS STATED IN TABLE I:

A. QUARTERLY EXPOSURE OF INDIVIDUALS TO LESS THAN INVESTIGATIONAL LEVEL I

EXCEPT WHEN DEEMED APPROPRIATE BY THE RSO, NO FURTHER ACTION WILL BE TAKEN IN THOSE CASES WHERE AN INDIVIDUAL'S EXPOSURE IS LESS THAN TABLE I VALUES FOR INVESTIGATIONAL LEVEL I.

B. PERSONNEL EXPOSURES EQUAL TO OR GREATER THAN INVESTIGATIONAL LEVEL I, BUT NO LESS THAN INVESTIGATIONAL LEVEL II

THE RSO WILL REVIEW THE EXPOSURE OF EACH INDIVIDUAL WHOSE QUARTERLY EXPOSURES EQUAL OR EXCEED INVESTIGATIONAL LEVEL I. HE/SHE WILL REPORT THE RESULTS OF HIS REVIEWS AT THE FIRST MIC MEETING FOLLOWING THE QUARTER WHEN THE EXPOSURE WAS RECORDED. IF THE EXPOSURE DOES NOT EQUAL OR EXCEED INVESTIGATIONAL LEVEL II, NO ACTION RELATED SPECIFICALLY TO THE EXPOSURE IS REQUIRED UNLESS DEEMED APPROPRIATE BY THE COMMITTEE. THE COMMITTEE WILL, HOWEVER, CONSIDER EACH SUCH EXPOSURE IN COMPARISON WITH THOSE OF OTHERS PERFORMING SIMILAR TASKS AS AN INDEX OF "ALARA" PROGRAM QUALITY AND WILL RECORD THE REVIEW IN THE COMMITTEE MINUTES.

C. EXPOSURE EQUAL TO OR GREATER THAN INVESTIGATIONAL LEVEL II

THE RSO WILL INVESTIGATE IN A TIMELY MANNER THE CAUSE(S) OF ALL PERSONNEL EXPOSURES EQUALING OR EXCEEDING INVESTIGATIONAL LEVEL II AND, IF WARRANTED, TAKE ACTION. A REPORT OF THE INVESTIGATION ACTIONS TAKEN, IF ANY, AND A COPY OF THE INDIVIDUAL'S EXPOSURE RECORD CARDS WILL BE PRESENTED TO THE MIC AT THE FIRST MIC MEETING FOLLOWING COMPLETION OF THE INVESTIGATION. THE DETAILS OF THESE REPORTS WILL BE RECORDED IN THE COMMITTEE MINUTES. COMMITTEE MINUTES WILL BE SENT TO THE HOSPITAL ADMINISTRATOR OF VALLEY VIEW MEDICAL CENTER FOR REVIEW. THE MINUTES, CONTAINING DETAILS OF THE INVESTIGATION, WILL BE MADE AVAILABLE TO NRC INSPECTORS FOR REVIEW AT THE TIME OF INSPECTION.



# VALLEY VIEW MEDICAL CENTER

595 South 75 East, Cedar City, Utah 84720 / 801-586-6587  
Dahl T. Gardner, Administrator

D. RE-ESTABLISHMENT OF AN INDIVIDUAL OCCUPATIONAL WORKER'S INVESTIGATIONAL LEVEL II ABOVE THAT LISTED IN TABLE I

IN CASES WHERE A WORKER'S OR A GROUP OF WORKERS EXPOSURES NEED TO EXCEED INVESTIGATIONAL LEVEL II, A NEW, HIGHER INVESTIGATIONAL LEVEL II MAY BE ESTABLISHED ON THE BASIS THAT IT IS CONSISTENT WITH GOOD ALARA PRACTICES FOR THAT INDIVIDUAL OR GROUP. JUSTIFICATION FOR A NEW INVESTIGATIONAL LEVEL II WILL BE DOCUMENTED.

THE MEDICAL ISOTOPE COMMITTEE WILL REVIEW THE JUSTIFICATION FOR, AND WILL APPROVE, ALL REVISIONS OF INVESTIGATIONAL LEVEL II. IN SUCH CASES, WHEN THE EXPOSURE EQUALS OR EXCEEDS THE NEWLY ESTABLISHED INVESTIGATIONAL LEVEL II, THOSE ACTIONS LISTED IN PARAGRAPH C ABOVE WILL BE FOLLOWED.

#### 4. SIGNATURE OF CERTIFYING OFFICIAL

I HEREBY CERTIFY THAT VALLEY VIEW MEDICAL CENTER, CEDAR CITY, UT, HAS IMPLEMENTED THE ALARA PROGRAM SET FORTH ABOVE.

Wayne M. Dade, R.T.  
WAYNE MCDADE, R.T.

Robert Evans, M.D., RSD  
ROBERT EVANS, M.D., RSD

Michael A. Baron, M.D.  
MICHAEL BARON, M.D.

INSTITUTION NAME AND ADDRESS:

VALLEY VIEW MEDICAL CENTER, 595 S. 75 E., CEDAR CITY, UT 84720