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PVH PORTAGE VIEW HOSPITAL

James S. Bogan, Administrator/CEO

November 5, 1993

Roy J. Caniano, Chief
Nuclear Materials Safety Branch
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: "Reply to a Notice of Violation"
NRC Lic. #21-18525-01
Docket #030-13827

Dear Mr. Caniano:

The following information is provided in response to the Notice of Violation dated October 13, 1993. The responses below pertain to the violations which were identified during the August 25, 1993 inspection.

Violation 1: Failure to hold a Radiation Safety Committee meeting between December 8, 1992 and June 10, 1993.

Response: The RSC meeting for the first quarter of 1993 had to be postponed several times due to vacations and it was, therefore, not possible to hold the meeting during the first quarter of 1993. Appropriate scheduling has eliminated this problem completely.

Violation 2: Failure of the licensee to conduct annual refresher training for the nuclear medicine technologist.

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Response: We believe that we have been in compliance. In the past, refresher training of the nuclear medicine technologist has taken place during our physicist's semi-annual visits. All of the topics necessary to satisfy the annual training requirements are discussed during the visits and documentation has always been maintained by the technologist's review and signature on NMA's reports. Documentation of education by Physicist and Radiologist are documented on the hospital education form.

Violation 3: Failure to perform surveys of the molybdenum 99/technetium-99 generator elution room on a daily basis.

Response: The original survey plan diagram for the department was two pages, the second page being the generator elution room. The second page was accidently filed away with the old survey records. The nuclear medicine technologist indicates that the surveys were performed but not recorded.

A new diagram which identifies all survey areas was prepared and once again includes the generator elution room.

Full compliance with this item was achieved on September 10, 1993.

Violation 4: Failure of the licensee to maintain survey records that identify each area surveyed in the generator elution room, the established trigger levels and the instrument used.

Response: The original survey plan diagram that included the generator elution room and which also indicated that "Unless otherwise specified the survey meter and well-counter identifies below will be used," had accidently been removed from the folder and filed with the old records.

A new survey plan diagram which identifies all survey areas, the established trigger levels and all instruments that will be used has since been prepared and will remain on file with the area survey records.

Violation 5: Failure of the licensee to monitor decayed radioactive trash at the container surface prior to disposal.

Response: In the past, decayed radioactive waste was surveyed at the surface and at one meter. It was explained to the technologist by the previous NRC inspector and NMA personnel that it was only necessary to monitor the waste at the container surface. The technologist misunderstood the explanation and discontinued the surface survey instead of the survey at one meter.

The proper procedures to be followed for disposal of decayed radioactive waste were reviewed with Mr. Sitaraman during a recent visit to the department by NMA.

Full compliance with this item was achieved on October 28, 1993.

Violation 6: Failure of the licensee to secure licensed materials against unauthorized removal from the place of storage.

Response: In the past, the technologist often left the door to the imaging room unlocked, but closed, while working in the generator elution room, which is just a few doors down from the imaging room. Since the imaging room is at the end of a hallway, it was not likely that anyone could pass by the generator room without detection by the technologist.

The technologist was instructed to close and lock the door to the imaging room whenever he was not actually present in the room.

Full compliance with this item was achieved on September 10, 1993.

Violations 7,8,9,& 10: Failure of the Radiation Safety Officer to review and sign annual accuracy test, quarterly linearity test, sealed source inventory and leak test results as required by 10 CFR 35.50 (e), (d) and (g) respectively.

In the past, the above mentioned results were reviewed by the RSO and he simply signed the RSO review page of NMA's reports. There was a statement on the RSO review page which indicated that the above mentioned test results had been reviewed and found to be within acceptable limits. For all of the quarterly NMA reports mentioned in the Notice of Violation, the results had been reviewed and the RSO had signed on the RSO review page. However, sometime during 1992, NMA's report was revised to include spaces for the RSO's signature at the bottom of the pages containing the above mentioned test results. The reason for the addition of the signature spaces was never clearly explained to the RSO.

In the future, upon receipt of NMA's reports, a meeting will be held with the RSO, Radiology Director, and the nuclear medicine technologist. NMA's reports will be reviewed by all and signed by the RSO during the meeting. Any corrections or items of interest noted in the report will be discussed at the meeting.

Full compliance with this item was achieved on September 10, 1993.

Violation 11: Failure of the licensee to possess a portable radiation detection survey instrument capable of measuring dose rates over the range of 0.1 millirem per hour to 1000 millirem per hour.

Response: This citation is in error and is being contested. The facility is currently in possession of two survey instruments that together satisfy the dose rate requirements listed. The first instrument is a Victoreen, Model #493, survey meter with a useful range of 0 - 50 millirem per hour. The other instrument is a Victoreen, Model #470A, Ion meter with a useful range of 0 - 1000 millirem per hour. Both survey instruments were presented to the inspector during the inspection. The calibration for both units was up-to-date at the time of the inspection.

We hope the above responses adequately address the violations listed in the Notice of Violation dated October 13, 1993. If any additional information is required, please do not hesitate to contact me for comment.

Sincerely,

James Bogan
Administrator