



THE MEDICAL CENTER
GEORGETOWN UNIVERSITY
WASHINGTON, D. C. 20007

OFFICE OF THE CHANCELLOR
202/625-7006

December 8, 1982

Thomas T. Martin, Director
Division of Engineering and
Technical Programs
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

RE: Inspection 82--01
Docket 30-01315
License No: 08-01709-04

Dear Mr. Martin:

This is in response to your letter of November 4, 1982, reporting the results of an N.R.C. inspection performed on August 24 and 25, 1982. The attached report, prepared by the Georgetown University Medical Center (G.U.M.C.) Radiation Control Office (R.C.O.) and approved by the Committee on Radiation Control, contains the information requested in your letter.

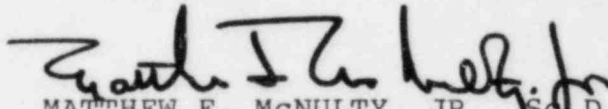
The Radiation Control Office recently published and distributed a manual including written policies and procedures related to the use of radionuclides at G.U.M.C. This manual was distributed in July and August of 1982, and the inspection performed on August 24 came at a time when those procedures were yet not fully implemented. The Radiation Control program had recognized many of the deficiencies mentioned in your inspection report. The R.C.O. was in the process of correcting those deficiencies. After a series of reviews and evaluations it is my evaluation that the R.C.O. and the total program are making effective progress.

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This office and the several senior management officers of the Medical Center are fully supporting the efforts and goals of the radiation safety program at the Georgetown University Medical Center.

Cordially,


MATTHEW F. McNULTY, JR., M.D.
Chancellor, The Medical Center

MFMcN:dyj

cc: Members, Administrative Council
John C. Rose, M.D.
Warren W. Schadt, Ph.D., CHP.

STATUS REPORT ON DEFICIENCIES
NOTED BY THE U.S. NUCLEAR REGULATORY COMMISSION
AT GEORGETOWN UNIVERSITY MEDICAL CENTER

Prepared by

Warren W. Schadt, PH.D., CHP
Director of Radiation Control
Office of the Chancellor
Georgetown University Medical Center

November 1982

I. Introductions

An inspection of Georgetown University Medical Center (GUMC) was conducted by the U.S. Nuclear Regulatory Commission (NRC) on August 24 and 25, 1982. The inspection consisted of a review of the activities conducted under the authority of NRC License No. 08-01709-04.

The purpose of this report is to: (1) describe the specific actions that have been accomplished to correct these problems, (2) describe the actions taken or planned which will correct these deficiencies, and (3) describe the policy changes that are necessary.

II. Actions in Deficient Areas

The following is in response to the four items mentioned in Appendix A of the NRC inspection report dated November 4, 1982. (Docket 30-01315).

Item A

- 1) Corrective action already achieved.

The door to the laboratory in the Nuclear Medicine Laboratory has been equipped with an automatic lock which secures the door when it closes. In addition the Nuclear Medicine Division staff, housekeepers and security officers have been directed to keep the door locked.

Item B

When patients are undergoing therapy treatments with radioactive materials, it is often impossible to limit radiation levels in the hallway outside the door to the patients room to levels below 0.59 mrem/hr (100 mrem/168 hours) as required by 10CFR20.105(b)(2). The patients which are a problem in this regard are ambulatory, and all practical measures which would restrict radiation levels outside to 0.59 mrem per hour would restrict the patient to bed and surround them with additional shielding. Such action would have a devastating emotional impact on most patients.

All of these patients undergo treatment for 24 to 48 hours. Our practice has been to ensure that the radiation levels in adjacent unrestricted areas comply fully with the limit of 500 mrem per year to a person in an adjacent area (10CFR20.105a). As discussed with Ms. Johansen by telephone on August 30, 1982, this procedure will soon be submitted as a requested amendment to NRC License 08-01709-04.

Item C

1) Daily surveys with a low-range survey meter are now being performed in the injection/preparation areas of the Nuclear Medicine Division.

2) Monthly surveys are being performed in Room 312 of the Medical-Dental Building where activities under Authorization Number 46 are conducted.

3) Monthly surveys are now being conducted in the Basic Science Building where activities under Authorization Numbers 32 and 63 are conducted.

Item D

1) The dose calibrator in the Nuclear Medicine Division is being tested for linearity quarterly and whenever it is returned from service.

2) The entire staff of the Department using room 309 of the Basic Science Building have been advised of the prohibition against eating in room 309 or any laboratory where radioactive materials are used or stored.

3) The requirement that all users of radioactive materials submit copies of all contamination test results to the Radiation Control Office each quarter was just recently initiated. Compliance with this procedure is rapidly improving.

As requested on page two of the November 4, 1982 letter signed by Mr. T.T. Martin, the following paragraphs confirm the procedures and/or equipment specified.

1) The new lock and closure device for Nuclear Medicine are discussed under item A of this report.

2) The thyroid bioassay program for persons performing iodinations or administering therapeutic quantities of radioactive iodine will comply with the provisions of NRC Regulatory Guide 8.20.

3) A request for license amendment will be submitted shortly requesting a yearly frequency for the calibration of radiation detection instruments used in a qualitative manner and a quarterly frequency for detectors used in a quantitative manner.

4) The inspections performed by the R.C.O. will include an audit designed to identify and correct violations of NRC regulations and license conditions.