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James F. Heitzenrater, Administrator

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August 24, 1994

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

SUBJECT: NOTICE OF VIOLATION
(NRC INSPECTION REPORT NO. 47-21163-01)
Docket No. 030-19861
License No. 47-21163-01

Gentlemen:

The following is in response to the violations found by Mr. Lee Franklin of your office during his inspection of our facility on June 28, 1994.

A. Item 1(b) of Appendix G to regulatory Guide 10.8 states that licensee management will conduct a formal annual review of the Radiation Safety program, including ALARA considerations.

Contrary to the above, as of June 28, 1994, no review of the ALARA program was conducted for the calendar year, 1993.

Response: We review our ALARA program on a quarterly basis, at each Radiation Safety Meeting. The fact that we did not state that any particular review was our "Yearly Evaluation" does not change the fact that a review was in fact conducted. In the future, we will designate one quarterly Radiation Safety meeting as our "Yearly Evaluation". This should correct the above violation. We will also continue to evaluate our ALARA program on a quarterly basis. Effective: August 31, 1994.

B. Item 2 of Appendix D to Regulatory Guide 10.8 states that all individuals who are occupationally exposed to ionizing photon radiation on a regular basis will be issued a film or TLD whole body monitor that will be processed by a contract service on a monthly basis.

Contrary to the above, TLD whole body monitor badges issued to personnel were not submitted for processing by a contractor on a monthly basis. Specifically, the badges issued to personnel for the period of March 10, 1993, to April 9, 1993, were not submitted for processing until May 5, 1993. (This is a repeat Severity Level IV violation.)

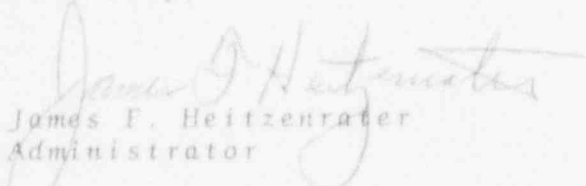
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Response: We do not feel that this was a repeat violation because of the following reason. During the time period in question, the new film badges that were to be issued April 10, 1993, were left in the same room used to test a new Mammography unit. Since we were not able to be certain that the film badges were not exposed during the course of these tests, Landauer was called and a new set of badges were requested. Landauer did not respond to this request, and so we decided it was better to use the badges we had for a longer time period than to use the badges whose integrity may have been compromised. We consulted with our contract Physicist who advised us to use the badges for the full sixty (60) days. We would then be able to divide our readings in half, thus, giving a more accurate reading. If the badges had been used, and been invalid, we would have had no reading for our entire monitored staff for the whole month.

This was a judgement call and we feel we made the right decision. NOTE: we use film badges, not TLD's as stated in your notice of violation; our TLD's are in a control envelope, and the Nuclear Tech's ring. To prevent any reoccurrence, we will put the new badges in a small lead lined box in the Chief Technologist's office; there is no equipment in the office. The badges will be stored in the lead box until such time they are issued. Effective: August 31, 1994.

Sincerely,


James F. Heitzenrater
Administrator

cc: Regional Administrator, Region II

J. Philip Stohr, Director
Division of Radiation Safety & Safeguards