



St. Mary's Hospital

2900 First Avenue / Huntington, West Virginia 25702 / (304) 526-1234

October 21, 1994

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

Dear Sirs:

Attached is our "Reply to a Notice of Violation" pursuant to the Notice of Violation arising from NRC Inspection Report No. 47-09576-02/94-01 and with your Docket No. 030-09717.

We assure you that St. Mary's Hospital has been, and continues to be, attentive to conscientious practice of radiation safety principles and to compliance with regulatory requirements. We are confident that we have properly addressed the Notice of Violation and that these will not be repeated.

Thank you.

Sincerely,

J. Thomas Jones
Executive Director/CEO

Attachment: 2 pages

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PDR ADOCK 03009717
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Reply to a Notice of Violation

Dear Sirs:

This is in reference to NRC Inspection Report No. 47009576-02/94-01 with your Docket Number 030-09717.

Two violations are listed:

1. One written directive for teletherapy lacked a signature of an authorized user and did not include the overall treatment period.
2. Two revisions of teletherapy prescriptions were not signed by an authorized user.

With respect to Violation Number 1:

- a. Reason for Violation: It is certainly not our practice to have written directives without signatures by the authorized user. In this particular case, there was simply an oversight. The prescription was acknowledged to be in the handwriting of the authorized user.
- b. Corrective Actions Taken Since the Inspection: This occurrence of the oversight was brought to the attention of the authorized user and to the attention of all department personnel. Since this was an isolated incident, it is not believed that further corrective action is required, beyond bringing it to everyone's attention with a reminder that no treatment is to be given without a complete written directive--including the signature of the authorized user. Chart checkers were also reminded to look for signatures in written directives.
- c. Results Achieved: There have been no such occurrences since the inspection.
- d. Corrective Steps to be Taken to Avoid Future Violations: We will continue to emphasize that the treating technologists must check for completeness of the written directive before implementing treatment.
- e. Date when Full Compliance is Achieved: We are currently in compliance (by September 21, 1994).

With respect to Violation Number 2:

- a. Reason for the Violation: Since the revisions were written by the same authorized user that wrote and signed the original prescriptions, he apparently did not notice that his subsequent signatures were missing. Neither was this noticed by the treating technologists or by the chart checkers.
- b. Corrective Actions Taken Since the Inspection: At an inservice training session on September 21, 1994, it was emphasized to all departmental personnel that it is very important that each revision be dated and signed by an authorized user before implementation of the directive.
- c. Results Achieved: Since the inservice training session on September 21, 1994, all revisions have been appropriately dated and signed.
- d. Corrective Steps to be Taken to Avoid Future Violations: We will continue to emphasize that the treating technologists must check for completeness of the written directive before implementing treatments or changes in the treatment.
- e. Date When Full Compliance is Achieved: September 21, 1994.