



DEPARTMENT OF VETERANS AFFAIRS

Medical Center
Martinsburg WV 25401

September 2, 1992

Mr. Douglas M. Collins
Chief, Nuclear Materials Safety
& Safeguards Branch
Division of Radiation Safety & Safeguards
Nuclear Regulatory Commission
Region II
101 Marietta Street, NW
Atlanta, GA 30323

In Reply Refer To 613/115

Dear Mr. Collins:

In reference to your letter of notice of violation of N.R.C.
Inspection Report No. 47-00714-02/92-01, dated August 20, 1992,
the following reply is being submitted.

A. Violation No. 1, which states that two of our technologists who elute generator and prepare, assay, and inject radiopharmaceuticals failed to wear TLD finger badges during three of the quarters in 1991. One of these technologists is no longer employed in our Hospital. However, the other technologist has been counselled and a written notice has been given to her to wear a finger badge which is required by the regulations. A model program to monitor personnel external exposure has been established according to Appendix D of regulatory guide of August 1987. A copy of that model program has been attached. In the future, RSO will periodically check the compliance of wearing whole body as well as finger badges by the Nuclear Medicine Technologists.

B. This violation deals with training of housekeeping as well as security personnel. A refresher course in Radiation Protection has already been provided on August 21, 1992, to housekeeping employees and a refresher course in radiation safety will be provided to security personnel on September 9, 1992. Therefore, an annual refresher course will be provided to all these employees.

C. The third violation which deals with leakage test of sealed source to be performed on six-month intervals was accepted. The Radiation Safety Officer performed a leakage test on July 8, 1992; however, it did exceed the six months' time interval. This deficiency was because of change of contract of Health Physicist during 1991. We have already discussed this problem with our Health Physicist and the RSO will make sure that leakage tests of sealed sources are performed within six months of the required period.

2.

Mr. Douglas M. Collins
Nuclear Regulatory Commission
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D. Violation No. 4, which requires inventory check of sealed sources on a quarterly basis, is also accepted. This deficiency was also because of a change of the Health Physicist during the past year. An inventory check was performed by the RSO on July 8, 1992; however, two quarters were missed prior to that time. The deficiencies mentioned in paragraph C and D were self-identified and corrected by our staff; however, we will make sure that these requirements are met according to our N.R.C. License application.

The reasons for the above violations were partly because of changing to another Health Physicist during the past year and partially because of failure on the part of technologists to understand the importance of wearing a finger film badge.

The corrective steps taken to correct these violations are as follows:

- a. Informing technologists in writing to wear finger badges.
- b. Having a conference with the Health Physicist and informing him of these violations and to conduct the training sessions by the Health Physicist for housekeeping employees as well as security personnel.

The Radiation Safety Officer will monitor the compliance of corrective actions taken so these violations are not repeated.

We expect full compliance to correct these deficiencies by September 9, 1992.

Sincerely yours,


THOMAS H. WEAVER
Medical Center Director

Enclosures

8/28/92

PERSONNEL EXTERNAL EXPOSURE MONITORING PROGRAM

VA MEDICAL CENTER, Martinsburg, WV 25401

We have established a personal external exposure monitoring program that has been modeled exactly as specified in Appendix D of Regulatory Guide 10.8, Revision 2, of August, 1987.

MODEL PROGRAM

1. Radiation Safety Officer will promptly review all exposure reports monthly to look for workers or groups of workers whose exposure is unexpectedly high or low. All individuals who were occupationally exposed to ionizing photon radiation on a regular basis will be issued film or whole body monitoring badge. These employees will include personnel working in Nuclear Medicine Service, Radiology Service, selected employees in Nursing Service, selected employees in Medical and Surgical Service and employees working in Dental Service. Any employee in the Hospital who is a potential candidate for receiving 10% of MPD during one year will be issued a film badge. These film badges must be worn on the collar outside the lead apron. Employees working in Nuclear Medicine Service who handle radioactive material that emits ionizing radiation will be issued a finger monitoring badge.
2. All technologists who elute generator or work in the Hot Lab or inject the patients with radioactive material must wear the finger badge while performing these duties. No exception will be accepted.
3. All other individuals who are occupationally exposed to radiation on an occasional basis such as Nurses or Physicians working in Medical Service, Surgical Service, or Dental Service will be issued a whole body badge and will be monitored by RSO.
4. All other individuals who are exposed to radiation on an occasional basis, such as Security personnel who deliver packages containing radioactive material to Nuclear Medicine Service or Secretarial personnel working in Nuclear Medicine Service, but do not work with the patients or nurses who occasionally care for patients who have received diagnostic doses will not normally be issued exposure monitors.
5. Eating or drinking liquids or applying makeup is strictly prohibited in areas where radioactive material is being used. These areas include areas such as IMaging, In-Vitro Lab, or Hot Lab, no such activity will be permitted. Special areas are provided for employees for eating.
6. At the end of the day, all nuclear medicine technologists are reminded to check for contamination of their hands either by use of

GM tube or by checking it under a sensitive gamma camera. Results should be recorded on a daily basis.



SATINDER P. GILL, M.D.
Chief, Nuclear Medicine Service
Radiation Safety Officer