

WEST CENTRAL COMMUNITY HOSPITAL

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30-31104

November 6, 1996

Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

SUBJECT: REPLY TO NOTICE OF VIOLATION

Gentlemen:

The following information is provided in response to your letter dated October 16, 1996, regarding a certain activity found to be in violation of NRC requirements during the routine safety inspection on September 18, 1996 of activities authorized under our NRC license no. 13-26043-01:

VIOLATION: Contrary to regulations, the licensee delivered to a carrier for transport packages of radioactive materials without ensuring by examination or appropriate test that external radiation levels were within allowable limits. Specifically, the licensee did not determine the external radiation levels on the bottom side of transport packages which contained technetium-99m generators prior to shipment.

(1) the reason for the violation

The nuclear medicine technologist was not aware of a requirement for surveying the bottom of the package. The survey is performed after the package is prepared for transport. The weight of the package makes it difficult to access the bottom surface since the package is labelled to remain in an upright configuration.

(2) the corrective steps have been taken and the results achieved

The NRC inspector demonstrated what he considered an acceptable technique for surveying the bottom surface by tilting the package even though this does not permit the three foot measurement to be made perpendicular to the bottom surface. This technique was utilized for the generator packaged for transport on September 20, 1996,

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and for all subsequent packages. As anticipated, the readings from the bottom surface have not been the highest observed.

- (3) the corrective steps that will be taken to avoid further violations

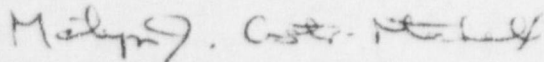
The nuclear medicine technologist will continue to monitor all surfaces of the package, including the bottom.

- (4) the date when full compliance will be achieved

Full compliance was achieved on September 20, 1996.

If you need any further information, please let me know.

Sincerely,



Marilyn Custer-Mitchell
Administrator

cc: ✓ U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555