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James M. Trapp, Director
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, ATTN:
Document Control Desk, Washington, DC 20555-0001

Regional Administrator, NRC
Region I, 2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

SUBJECT: Inspection Report No. 03038890/2019001; EA-20-010

Dear Mr. Trapp:

In response to the finding and report submitted to Dr. Julio Diaz on May 5, 2020; we investigated these and have elucidated that we may improve our procedures.

1. Findings.

- a. In reference to the two violation of the console key, keycard and key used to access outer door of the "High Dose Rate" (HDR) unit located in room 147. We understand that it was an unintentional error during the inspection because the physicist got nervous; at the request of the inspector to see a record he gets up to look for him forgetting to take the key out of the console, keycard, and key. It is the first time this happens to us. The physicist has all the knowledge and training that is required to perform the procedures in this area.

2. Corrective Actions.

- A. The physicist and all the staff were oriented on the security management of the HDR equipment and specifically on the management of both keys to avoid unauthorized entry.
- B. The keys shall never be left unattended.
- C. If the physicist must leave the area and there are no authorized personnel under the license, he must keep all the keys in the security locker located in his office. Security has been increased by requiring more stringent controls that ensure avoiding unauthorized entry into HDR room.
- D. In addition to the keycard, the physicist will always have the manual key when he will use the HDR.
- E. Changes were discussed and approved by the Radiological Protection Committee in which we agreed to ensure regulatory compliance.

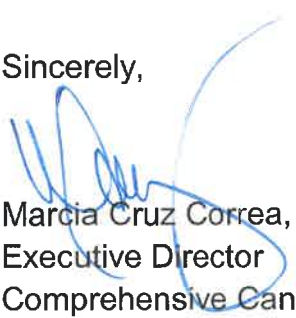
3. Agreements.

- a. The HDR Safety and Management Protocol was revised to reflect more stringent controls. These changes were discussed and approved by the Radiological Protection Committee
- b. The program of educational conferences for HDR staff was reinforced to avoid future mistakes.
- c. The Radiation Safety Officer (RSO) shall increase inspection frequency.

d. Two weeks from the date of this letter, full compliance will be achieved.

If you have any questions concerning this matter, please contact us at, (787) 772-8300
ext. 8311.

Sincerely,



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