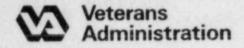
Seventh Street and Indian School Road Phoenix, AZ 85012



May 23, 1986

1580 MY 29 PM 12 56

In Reply Refer To: 644/114

Mr. R. A. Scarano, Director Division of Radiation Safety and Safeguards U.S. Nuclear Regulatory Commission, Region V 1450 Maria Lane, Suite 210 Walnut Creek, California 94596

Dear Mr. Scarano:

This letter is in reply to your letter dated April 28, 1986 which provides a report of the inspection conducted by Mr. Skov of your office on March 3-4, and March 13-14, 1986. Each of the areas of noncompliance are addressed in the order they are presented in your letter.

- A. In order to prevent the inadvertent disposal of gauze or other dressings from diagnostic nuclear medicine patients in the ordinary trash, the waste paper can has been removed from the hot lab. All trash from the hot lab will be placed in a properly marked radioactive waste receptacle and monitored before disposal using our standard monitoring procedures.
- B. To prevent unauthorized access to the hot lab an automatic door closure device has been installed on the door to the lab. This door will be shut and locked any time the nuclear medicine technologists are not in the clinic. It should be noted that the hot lab opens to the prep area which in turn opens to the scanning room which finally opens to the unrestricted hallways of the hospital (see attached plan). Given the design of the clinic, we feel that the unauthorized removal of radioactive material from the hot lab is a very unlikely occurrence.
- C. All diagnostic and therapeutic radiopharmaceuticals are currently prepared and hand delivered by Nuclear Pharmacy (Syncor Corp.), which operates a radiopharmacy on 7th Street several blocks south of the hospital. All of our isotopes are hand delivered and do not suffer the abuses typically associated with delivery by a common carrier. However, we will monitor and prepare a receiving report for all therapeutic quantities of radioactive materials we receive (see enclosed form).

8606230073 860616 REG5 LIC30 02-10072-01 PDR Page 3

Mr. R. A. Scarano, Director, Div. of Radiation Safety and Safeguards

Please contact me or our Radiation Safety Officer, Dr. LeGrand at FTS 764-7663, if you have any questions concerning these changes.

Sincerely yours,

AAY L. BOURNE for Medical Center Director

Enclosures: Link Drawing for Clinic Receiving Report Form Close-out Survey Results May 23, 1986

644/114

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Mr. R. A. Scarano, Director, Div. of Radiation Safety and Safeguards

- D. 1. A request for a license amendment pertaining to our remodeled clinic was prepared and submitted for your review on March 21, 1986. We apologize for the delay in the preparation of this document.
- 2. The dose calibrator linearity test for the third quarter of 1985 was performed in August, 1985 and the results of the test indicated that the dose calibrator was within five percent of the predicted results. Unfortunately the data sheet for this test was lost during our move.
- 3. a. All of the radiation surveys listed in this section were performed but the results were not recorded.
- b. A radiation survey of Room 3221 was performed prior to the release of the room for the next patient, however the results of the survey were not recorded.
- c. A radiation survey of exposure rates in adjoining rooms was not made for the iodine-131 therapies performed on August 12 and September 10, 1985. These surveys will be performed on all future therapies or the adjoining rooms will be maintained empty.
- d. A radiation survey of Room 2413 was performed prior to the release of the area for unrestricted use, however the results of the survey were not immediately recorded. The results of this survey are attached.

In addition to the above actions, the nuclear medicine personnel have been instructed to place additional emphasis on their radiation safety duties and to improve the recordkeeping for their surveys and performance tests. Also, we have instructed the Safety Specialist, the Administration's representative on the Radiation Safety Committee, to perform quarterly audits of the nuclear medicine radiation safety program using a checklist provided by our consulting health physicist. Results of these audits will be presented to the Radiation Safety Committee.

We feel that these changes in our radiation safety program should reduce or eliminate the findings of noncompliance in your future inspections.

VA Medical Center 7th St. & Indian School Rd. Phoenix, Arizona 85012

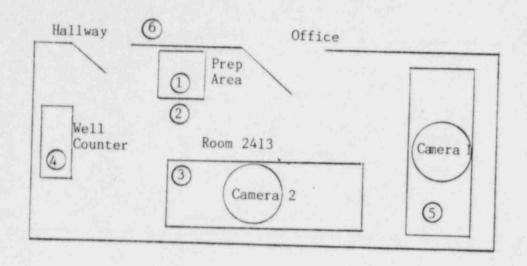
Page 3

Mr. R. A. Scarano, Director, Div. of Radiation Safety and Safeguards
Please contact me or our Radiation Safety Officer, Dr. LeGrand at
FTS 764-7663, if you have any questions concerning these changes.
Sincerely yours,

RAY L. BOURNE Medical Center Director

Enclosures: Link Drawing for Clinic Receiving Report Form Close-out Survey Results

ManufacturerI	Isotope			Activity				
P.O. Number	Date				Surveyor			
Survey or Test			Yes		0	Comments		
Condition of package OK		()	()			
Radiation levels agree w/label)	()			
Contents & packing slip agree)	()			
Contamination of packing materials)	()	Wipe test		
Contamination of source								
Contamination of source If no removable contaminat box and packing materials	in ordina	oun	tra	blitesh.		e labels and dispose o		
If no removable contaminat box and packing materials	in ordina	ound	d, o	blitesh.	erat	e labels and dispose o		
If no removable contaminat box and packing materials ManufacturerI	in ordina	oundary	d, o	blitesh.	erat	e labels and dispose o		
If no removable contaminat box and packing materials Manufacturer	sotope	oundary	d, o	blitch.	erat	e labels and dispose o		
If no removable contaminat box and packing materials Manufacturer	sotope	Ye	d, o	blitch.	Acti	e labels and dispose o		
If no removable contaminat box and packing materials ManufacturerI	in ordina	Ye	d, o tra	blitesh.	Acti	vityeyor		
If no removable contaminat box and packing materials Manufacturer	in ordina sotope ate	Ye (d, o tra	blitesh.	Acti	e labels and dispose o		
If no removable contaminat box and packing materials Manufacturer	in ordina sotope ate	Ye (es))	blitesh.	Acti	e labels and dispose o		



INSTRUMENT: Ludlum Model 3 w/ 44-9 Pancake Probe Closeout Survey - All equipment moved to new clinic area.

Date	Location Number	Direct Radiation	Surface Contamination	Initials	Comments
12/20/8	1	<0.05 mR/hr		25	Closeout Surve
2/20/85	2	<0.05 mR/hr		7.5	Groseour Burve
2/20/85	3	<0.05 mR/hr		72	
2/20/85	4	<0.05 mR.hr		23	
2/20/85	5	<0.05 mR/hr		7 5	
2/20/85	6	<0.05 mR/hr		75	