



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAR 30 1988

MEMORANDUM FOR: William L. Fisher, Chief
Nuclear Materials and Emergency
Preparedness Branch, Region IV

FROM: Vandy L. Miller, Chief
Medical, Academic and Commercial
Use Safety Branch, NMSS

SUBJECT: VETERANS ADMINISTRATION NUCLEAR NETWORK

This is in response to your request for additional technical assistance relative to the renewal of the by-product materials licenses currently held by the Veterans Administration Medical Centers in Cheyenne, Wyoming and Grand Junction, Colorado. We have reviewed the case, the previous technical assistance request, AUC Comments, previous policy guidance on the subject and the following comments are made:

1. The proposed V. A. Network does not resolve the issue of providing effective on-site nuclear medicine supervision for radiation safety, regulatory compliance, management oversight and sustained quality assurance to the level and frequency required to assure patient and worker safety.

2. The Veterans Administration Medical Center (VAMC) in St. Louis has not demonstrated that it exercises direct supervision over the nuclear medicine operations in either the Cheyenne or Grand Junction facilities. The Cheyenne and Grand Junction facilities are independent hospitals and retain their own management and medical staff.

3. VAMC St. Louis appears to function as a focal point for nuclear medicine resources and expertise for these and other medical centers. The service is analogous to a contract health physics service or consultative service for resolving medical questions. As such, the subject institutions do not appear to be under any legal obligation to follow the advice or suggestions of VAMC St. Louis. The NRC license remains the regulatory control at these institutions.

4. The only precedent that appears to be similar in concept is the VAMC St. Louis' direct support of other medical centers within its geographic area. These relationships have been recognized by amendment to the institution's NRC license. These were approved, in part, due to the supportive nature of the relationship and the close proximity of the satellite hospitals to VAMC St. Louis. Due to the larger distances between VAMC St. Louis and the Cheyenne and Grand Junction facilities it appears that VAMC St. Louis can do little more than offer "consultative" services on an infrequent basis to these hospitals at this time.

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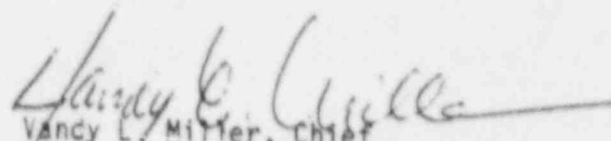
William L. Fisher

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Because the proposed network does not appear to offer equivalent, or improved, safety and quality assurance standards over those offered by direct, day-to-day supervision, it is recommended that the licenses be renewed in accordance with current regulation and licensing policy.

Should the situation regarding the Veterans Administration's nuclear network program significantly change, their proposal should be reconsidered.

Please contact James H. Myers at FTS 492 - 0635 if you have further questions.


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