

July 27, 1989

Response alequaticope 7/31/89 ADEQUATE BAP 7/31/89

Ms. Colleen Casey Nuclear Material Safety Section I US Nuclear Regulatory Commission Region III 799 Roosevelt Rd. Glen Ellyn, Illinois 60137

34-00179-02

Dear Ms. Casey:

This letter is written in response to our recent phone call (July 25) and correspondence to your office (letter written July 6). The matter concerns the recent safety inspection of our facility on May 23, 1989 by you and Mr. B. A. Parker.

As indicated on your letter of June 9, 1989, our facility was found in violation of NRC requirement license condition #19. This requires area surveys of all locations and permanent record kept for results, including negative results.

This was a repeat violation stemming from an earlier inspection in December 1983. Reviewing our records of that inspection and subsequent correspondence (letter dated April 18, 1984) it is apparent that no corrective action was taken at that time. This arose because of a disagreement apparently between our consulting physicist, Dr. Callendine, and the NRC as to the requirements mandated by the NRC regulation. This resulted in the unfortunate situation discovered in the repeat inspection of May 23, 1989.

Our response to this violation is as follows:

- 1. Immediate recording of all pertinent areas and maintenance of written records. (See the attached worksheets).
- Monthly review by Radiation Safety Officer of such records with documentation of results.
- 3. Regular quarterly review of such documents by the Radiation Safety Committee with formal record included in the minutes of these quarterly meetings.

This program was instituted as soon as we were aware of the violation and our procedure manual has been revised in this regard.

This corrective action will be successful in complying with the NRC regulation, and represents our understanding of compliance with this violation.



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Since no corrective action was taken following the letter dated April 14, 1984, the current procedures I believe will be successful in correcting the violation and I will be personally checking the implementation and maintenance of this policy.

Respectfully submitted,

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Donald M. Miller, M.D. Radiation Safety Officer

Smith Clinic

cc: Charles Garvin, M.D.

DAILY RADIATION SURVEY CHECK RECORD

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