



April 26, 2005

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

N.R.C. License #37-15480-01
Docket No. 030-09176

SUBJECT: REPLY TO A NOTICE OF VIOLATION, EA 05-005

To Whom It May Concern:

I am writing in response to your letter dated April 6, 2005 referencing a correction to the March 31, 2005 notice of violation. The following specific corrective actions have been taken to correct and achieve full compliance with the twelve regulatory violations cited in your letter. Full compliance was achieved prior to the enforcement hearing. To assure that the remaining portion of our licensed activities continue to be maintained in accordance with our license conditions and regulations, we will continue to have our program monitored monthly by our consultant medical radiation physicists from Walter L. Robinson & Associates. Should we ever need to reopen our unsealed and or brachytherapy programs, all necessary precautions will be put into place to prevent a recurrence of the previous conditions that allowed the twelve violations to occur.

- A. We have discontinued the brachytherapy operation and unsealed source therapy program listed on our N.R.C. license. Therefore, no procedure requiring a written directive will be performed.
- B. We have discontinued the brachytherapy operation and unsealed source therapy program listed on our N.R.C. license. Therefore, no procedure requiring a written directive and written procedures will be performed.
- C. We have discontinued the brachytherapy operation and unsealed source therapy program listed on our N.R.C. license. Therefore, no procedure requiring a written directive, surveys, and dose calculations will be performed.

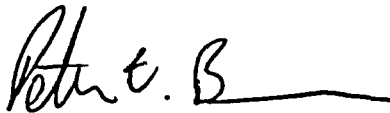
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- D. We have discontinued the brachytherapy operation and unsealed source therapy program listed on our N.R.C. license. Therefore, no procedure requiring a written directive, survey, dose calculation or written instructions will be performed.
- E. We have discontinued the brachytherapy operation and unsealed source therapy program listed on our N.R.C. license. Therefore, no procedure requiring a written directive and surveys to account for non-implanted sources will be performed.
- F. We have discontinued the brachytherapy operation and unsealed source therapy program listed on our N.R.C. license. Therefore, no procedure requiring a written directive will be performed. Sources will remain locked in storage and inventoried on a quarterly basis until disposal can be satisfactorily arranged.
- G. We have discontinued the brachytherapy operation and unsealed source therapy program listed on our N.R.C. license. Our nursing staff and other personnel will not be caring for patients receiving brachytherapy. Therefore, no annual training specific to brachytherapy will be necessary.
- H. We have discontinued the brachytherapy operation and unsealed source therapy program listed on our N.R.C. license. Therefore, no procedure requiring a written directive will be performed and annual audits of the brachytherapy program will not be necessary.
- I. We have discontinued the brachytherapy operation and unsealed source therapy program listed on our N.R.C. license. Therefore, no procedure requiring a written directive and the associated surveys will be performed.
- J. We have discontinued the brachytherapy operation and unsealed source therapy program listed on our N.R.C. license. Therefore, radiation oncologists will not be part of our program. We will however, continuously review our personnel monitoring program to ensure that any individual likely to receive 10% of the limits in 10 CFR 20.1201(a) is monitored.
- K. While we have discontinued our brachytherapy program, our Cs-137 sources are being held in storage. All containers of licensed material bear a durable, clearly visible label bearing the words "Caution, Radioactive Material."

- L. Prior to using radioisotopes that are new to our program, we will verify the isotope correction factor with the radiopharmacy and/or our medical physicist and apply it accordingly. Volumetric calibrations of the dose calibrator and volumetric measurements of the dosage will be performed, if needed.

If you any questions, or need further information concerning this response or the corrective action to be taken, please contact our consultant medical physicists, Mark Liddington or Walter L. Robinson at 717-291-9813 (Ext. 2 and 1, respectively).

Sincerely,

A handwritten signature in black ink, appearing to read "Peter E. B.", followed by a horizontal line.

Peter Bergmann
Chief Executive Officer