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April 28, 2005

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

Docket No. 03014397  
License No. 52-18072-01

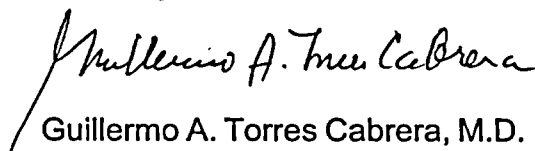
Dear sirs:

On January 26, 2005 Héctor Bermúdez of the Division of Nuclear Materials Safety conducted a safety inspection at my office where he found two violations.

Enclosed find my "Reply to a notice of violation".

If you need any more information please contact me at my office or Email me at [torreca@prtc.net](mailto:torreca@prtc.net).

Sincerely,

  
Guillermo A. Torres Cabrera, M.D.

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**Guillermo A. Torres-Cabrera, M.D.**  
Caguas, PR

April 27, 2005

**REPLY TO A NOTICE OF VIOLATION**

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

Docket No. 03014397  
License No. 52-18072-01

Dear Sir:

On January 26, 2005 Héctor Bermúdez of the Division of Nuclear Materials Safety conducted a safety inspection at my office, where he found two violations. I accept both violations and will not contest this enforcement action.

**VIOLATION A.** 10 CFR 35.433 requires, in part, that only an authorized medical physicist calculate the activity of each strontium-90 source that in turn is used to calculate the treatment times for ophthalmic treatments.

**1) REASON FOR THE VIOLATION:**

Using a table provided to me by the instrument manufacturer and later another one provided by a NRC inspector, I had been calculating the activity of my strontium-90 source for the last 27 years (since 1978). Using my calculations, I applied adequate treatment times to patients following pterygium excision surgery. This is evidenced by the excellent clinical results I had in several thousand cases performed during those 27 years. Years of close follow up has demonstrated that there have been almost no complications and a very low recurrence rate of the operated pterygia.

In addition, over the past 27 years, my calculations were reviewed several times by different NRC Inspectors who inspected my office and who found them to be in good order.

**2) CORRECTIVE STEPS:**

Although my calculations were never incorrect and posed no risk to any patient, in order to comply with NRC regulations, arrangements have been made with medical physicist David Rhoe to calculate the activity of my strontium-90 source from now on instead of doing it myself.

**3) CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS:**

Medical physicist David Rhoe will calculate the activity of my strontium-90 source periodically as required by NRC Regulations. This should avoid further violations.

**4) DATE WHEN FULL COMPLIANCE WAS ACHIEVED**

In August 2004 the Department of Medical Physics of the University of Wisconsin calibrated my source and gave me the current dose rate in a document signed by two medical physicists. This document was reviewed by Héctor Bermúdez during his inspection. If you need copy of the document I can provide it. I have been using this dose rate since Héctor Bermúdez visited my office on January 26, 2005, therefore this violation should be considered corrected since that date.

**VIOLATION B.** According to your notice of violation dated 24 February 2005 I am not required to reply to this violation because the violation was corrected during the inspection.

If you need any more information please contact me at my office.

Sincerely,

  
Guillermo A. Torres Cabrera, M.D.