

January 27, 2006

Paul Gotti, MS, BCNP
Radiation Safety Officer
Cardinal Health
Nuclear Pharmacy Services
7000 Cardinal Place
Dublin, OH 43017

SUBJECT: NRC REVIEW OF RESPONSE FROM CARDINAL HEALTH REGARDING
ITEMS OF CONCERN AND NON-CITED VIOLATION

Dear Mr. Gotti:

This refers to your letter, dated November 15, 2005, that provided a response to several items of concern discussed in our October 5, 2005 letter. Specifically, this letter addresses your response to the concern regarding your staff not always wearing laboratory coats or other protective clothing in areas where radioactive materials are used at your Huntington, West Virginia pharmacy.

Based on our review of your November 15, 2005 letter, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. The violation involved the failure of your staff at the Huntington, West Virginia pharmacy to always wear laboratory coats or other protective clothing in areas where radioactive materials are used in accordance with License Condition 24 of NRC License Number 34-29200-01MD. License Condition 24 requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the application, dated March 29, 2001. Section 10.4 of your application requires that lab coats or other protective clothing be worn in areas where radioactive materials are used.

The violation occurred after the November 2004 merger of a Geodax pharmacy with Cardinal Health's Huntington, West Virginia pharmacy. The root cause, as discussed in your November 15, 2005 letter, was that while Cardinal Health's policies required the use of lab coats in areas where radioactive materials are used; Geodax did not require the use of lab coats in its facilities. Cardinal Health staff implemented corrective actions that included retraining all employees at the Huntington, West Virginia pharmacy on Cardinal Health's policies for employees entering the restricted area including the requirement to wear lab coats in areas where radioactive materials are used.

The violation was evaluated in accordance with the NRC Enforcement Policy and is being treated as a Non-Cited Violation, consistent with Section VI.A of the Enforcement Policy since the violation was licensee identified and corrected. The current Enforcement Policy is included on the NRC's Web site at www.nrc.gov; select **What We Do, Enforcement**, then **Enforcement Policy**.

If you contest the violation or significance of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to the Regional Administrator, Region III, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence is already adequately addressed on the docket in this letter. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and your response, if any, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

John R. Madera, Chief
Materials Inspection Branch

Docket No. 030-36973
License No. 34-29200-01MD

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