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REGION I
2006 AUG -3 PM 2:44

R-4

Tuesday, July 25, 2006

United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Dear Mr. James P. Dwyer, Chief
Commercial and R&D Branch
Division of Nuclear Materials Safety

45-25546-01
030 35599/2006001

"Reply to a Notice of Violation"

Thank you very much for your recent letter of notice of violation. We appreciate the opportunity to inform you of the corrective steps that have been taken to address the violations noted and to make all earnest efforts to prevent any recurrences in the future.

Violation A. 10 CFR 35.61 (a) requires, in part that a licensee calibrate survey instruments used to show compliance with 10 CFR Parts 20 and 35 annually. Failure to comply with this policy was simply an oversight. In reading the date on the survey meter the technologist mistakenly read the "new calibration due" date of 07/2005 as being the actual "calibration record" date.

Action Plan: The calibration has been duly completed (see attachment). However we are now posting the new required calibration date in several areas; our nuclear department desktop calendar, our front office computer calendar used for daily patient and event scheduling as a reminder to inform our technologist of survey meter calibration due date. These multiple postings should help us to never miss the required maintenance schedule.

Violation B. 10 CFR 35.67(b) (2) requires that a licensee in possession of a sealed source test the source for leakage at intervals not to exceed six months or at other intervals approved by the Commission or an

Agreement State in the Sealed Source and Device Registry with exceptions in 10 CFR 35.67 (f).

Action Plan: The sealed source tests have been adequately completed (see attachment). As a reminder and to prevent this violation from occurring once again, these dates have been posted in several areas. On our nuclear department desktop calendar, our front office computer calendar used by front office staffing for daily patient and event scheduling. By posting these important dates in several date planner locations, we are ensuring that these oversights do not reoccur.

We are pleased to institute these measures to ensure compliance with all rules and procedures necessary to assure high standards of quality and safety in our work.

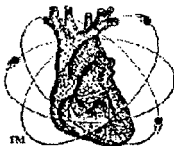
Thank you kindly,

A handwritten signature in black ink, appearing to read "Bruce Ward RSO".

Dr. Bruce Ward, RSO

Commonwealth Cardiology Associates
Richmond, VA
(804) 788-0004
(804) 788-0620

Docket No. 03035599
License No. 45-25546-01



NC SYSTEMS, INC.
NATIONAL LABORATORIES
5660 AIRPORT BLVD., SUITE 101
BOULDER, CO 80301
303-541-0044



Calibration Certificate

This is to certify that the instrument described below was calibrated by or contracted through our laboratory on;

Instrument Geiger Counter Manufacturer Bicron Model # surveyor 2000
Serial# C098H Detector SWGM#C814D

The instrument was found to be within the manufacturer's specifications or within the tolerances and specification given below.

Detector(s)	Range(s) Scales(s)	Calibration Point		Reading	Other Specs or % error
Internal	X1000	1,500	mR/h	1,480	mR/h
Internal	X1000	500	mR/h	520	mR/h
External	X100	150	mR/h	147	mR/h
External	X100	50	mR/h	51	mR/h
External	X10	15	mR/h	15	mR/h
External	X10	5	mR/h	5	mR/h
External	X1	1.5	mR/h	1.5	mR/h
External	X1	.5	mR/h	0.5	mR/h
NA	X0.1	314	ppm	0.155	mR/h
NA	X0.1	109	ppm	0.048	mR/h

Check Source Reading: 0.9 mR/h

Instrument was repaired as noted below.

Comments:

This will further certify that all calibrations were performed using standards traceable to the National Institute for Standards and Technology (NIST). Calibration methods may be obtained by contacting our office.

07/22/06
Date
07/22/07
Recalibration

[Signature]
By
Laboratory Manager
Title
5827-43
License Number



Licensee: Commonwealth Cardiology Associates, LTD

City: Richmond **State:** Virginia **Zip:** 23220

License #: NRC 45-25546-01 **Telephone:** (804) 788-0004

Source

Current

Wipe

Assay

LLD

Analysis

Next Leak Test Due:(every 6 mo.) 13-Jan-2007 **Next Inventory Due:(every 3 mo.)** 13-Oct-2006

Assay Performed By: Thomas Euler Date: 19-Jul-2006

RSO Signature: Bruce W. Hurd Date: 7/31/06



NC Systems, Inc. • Licensed Leak Testing • Colorado 751

5660 Airport Blvd., Suite 101, Boulder, CO 80301 • (800) 548-4024 • (303) 541-0044 • (303) 541-0066 FAX

SealedSourceLeakTest&Inv6-02