

Connecticut Hematology & Oncology

PET Imaging Center

06-31418-01
030-38340
2011-001

October 12, 2011

Re: NRC Inspection on 9/27/2011

Dear Miss Gabriel,

In response to your letter dated on September 28, 2011 summarizing the agency inspection violations identified in the PET imaging facility at the Connecticut Hematology and Oncology center, we have conducted the following corrections:

Periodic Review of Radiation Protection Program

As per 10 CFR 20.1101, RSO, Sadek Nehmeh, has reviewed the radiation protection program and its implementation at this facility following the model from NUREG-1556, vol. 9, Appendix K. The auditing results are attached. The modifications that were performed to the procedure manual, including the radiation safety program, are summarized in the first page of the attached procedure manual. The next program review will be scheduled in September 2012, and will continue annually thereafter.

Sealed Source Leak Tests

Unfortunately, we have missed doing sealed source leak tests between 2009 and 2011 thinking that it was not required. Consequently, no leak tests have been performed between August, 2009 and May, 2011. However, as soon as Miss Coleman became aware of the regulations in May 2011, she took immediate action performing leak test for sealed sources present in the facility. As our procedure manual states, we commit performing sealed source inventory and leak test (when required by SSDR) on a quarterly and semi-annual basis respectively.

For the ^{57}Co source, its use was discontinued and it was placed in storage since 8/8/2009, and therefore, to our knowledge, no leak testing was required by NRC for that particular source.

For the ^{68}Ge rod sources currently installed on the PET scanner, those were leak tested upon installation. Unfortunately, we do not have access to the sources at this time (only Siemens engineers are allowed to open the PET scanner). However, we have currently performed wipe

test of the areas on the outside of the scanner, closest possible to the 68-Ge sources, as suggested you suggested during your visit to our site. We commit to perform these tests on a semi-annual basis.

Procedure Manual and Radiation Safety Training

The procedure manual has been reviewed and updated by Sadek Nehmeh, RSO. Radiation safety procedure, ALARA practice, and QC procedures for both the hotlab and PET scanner have been reviewed and discussed by the RSO with Miss Coleman. This was documented in the audit form (attached).

RSO Agreement:

A RSO agreement to take responsibility to implement radiation safety program, per 10 CFR 35.24(b) has been sign by both Miss Catherine Coleman and Dr. Sadek Nehmeh. The RSO authority, duties, and responsibilities have also been documented and signed by both parties.

Postings:

NRC Form 3 ("Notice To Employee") and Miss Coleman's license are already posted in the hotlab. We commit to post the NRC license Copies of 10 CFR 19, 10 CFR 20, and 10 CFR 35 have been posted in the hotlab as well.

If you have any questions or further concerns about our radiation safety program please do not hesitate to contact me.

Best Regards,

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