

**Veterans  
Administration**

March 18, 1983

In Reply Refer To:

Licenses Nos.: 08-00942-04  
08-00942-05  
SNM-1605

Mr. Thomas T. Martin, Director  
Division of Engineering and  
Technical Programs  
U. S. Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

THRU: Dr. James J. Smith, Director  
Nuclear Medicine Service (115)  
VA Central Office  
Washington, D.C. 20420

Dear Mr. Martin:

SUBJECT: Inspection No 83-01

This letter is in response to the Notice of Violation I received as a result of the above referenced inspection.

This Medical Center has placed high priority on the safe use of radioisotopes, as we can demonstrate. Please consider the actions that we have taken with regard to the items indicated in Appendix A of your letter dated February 7, 1983. I have arranged my responses to correspond with the items as they were listed. The responses are contained in enclosure 1 of this letter.

I have taken several important steps to assure control of the Radiation Safety Program. The following steps were taken before the inspection of January 5, 1983.

1. The Radiation Safety office was reorganized by making it a part of the office of the Chief of Staff of this Medical Center.
2. The position was upgraded, which will reduce the chances of losing an experienced RSO to another hospital.
3. I hired a consultant to review the Radiation Safety Program, including the qualifications of the RSO, and to make recommendations to me.


2.

Inspection No. 83-01

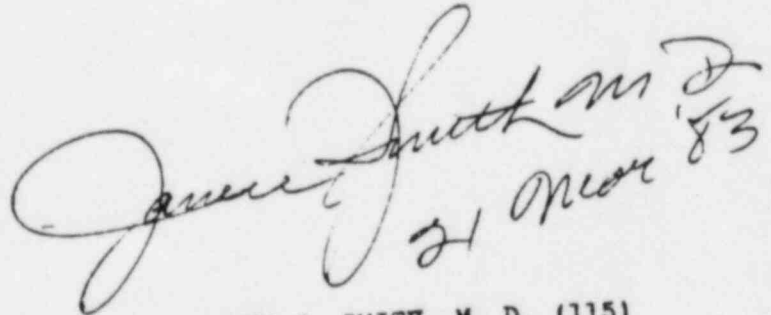
U.S. Nuclear Regulatory Commission

As you know, in a specialized office such as the Radiation Safety Office at a hospital, an unexpected vacancy can have a devastating effect on the program. Recruitment for such a position can take several months. I will of course, begin recruitment for an RSO immediately on notice from our present RSO, should he decide to leave. During the interim period between the RSO's departure and the date the new RSO reports, I will employ a consultant to supervise the radiation safety program.

Sincerely yours,

  
R. A. CAVAZZI  
Medical Center Director

Enclosure

  
21 Mar '83

JAMES J. SMITH, M. D. (115)  
Director, Nuclear Medicine Service  
VA Central Office  
Washington, D.C. 20420

SPECIFIC RESPONSES TO NRC NOTICE OF VIOLATIONS

- A. (1) Personnel monitoring is provided to the student nuclear medicine technologists by Prince Georges's Community College. This includes both whole body and finger monitors. After the inspection, Mr. Bowman called the Radiation Safety office at PGCC and arranged an informal agreement to have copies of the student's exposures reports sent here for evaluation. The students wear the PGCC monitors while they are here.

The occupational dose to the extremities of those persons whose badges were not processed for December 1980, May 1981, January 1982, and May 1982 will be estimated. This will be done by April 30, 1983.

- A. (2) It is standard procedure to perform a thyroid uptake test on each person involved in an iodination. In the future, this policy will be enforced more strictly. Sufficient air concentration measurements will be made during iodinations to assure compliance with 10 CFR 20.103. We will be in compliance by March 31, 1983.
- B. The occupational dose for the current calendar has now been determined for the students who work part-time in the restricted area and part-time at other facilities. We will determine the occupational dose for students in future rotations before they enter the restricted area.
- C. (1) Syringe shields have now been provided for unit dose preparation and are required for all dose preparation. We have complied with this requirement.
- C. (2) The required surveys will be made and contamination exceeding the levels defined by our guidelines will be removed.  
A. The compliance date for this item is March 31, 1983.
- C. (3) We will maintain records according to the "Radiation Safety Guide." The RSO will inspect the users records periodically.

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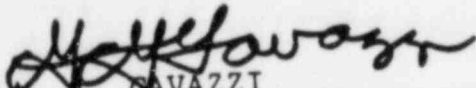
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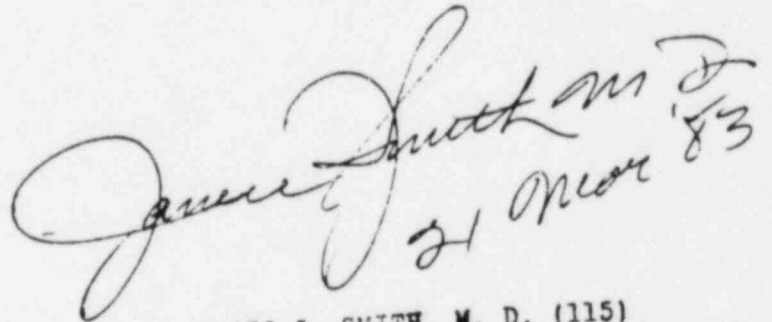
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