

WESTLAND MEDICAL CENTER

2345 Merriman Road

Westland, Michigan 48185

(313) 467-2300

David C. Kreger
Vice President & Chief Operating Officer

May 2, 1985

United States Nuclear Regulatory Commission
Region III, Office of Inspection and Enforcement
799 Roosevelt Road
Glen Ellyn, Illinois 60137

ATTN: J. A. Hind, Director
Division of Radiation Safety and Safeguards

Dear Mr. Hind:

This letter is Westland Medical Center's response to the N.R.C. letter of April 10, 1985, which listed items of noncompliance to NRC License No. 21-02936-01 and 21-02936-02. These items of noncompliance were observed by Mr. W. J. Slawinski of your office during his visit of February 25 and 27, 1985. Please refer to the Appendix of your letter for the following references by item.

Item 1: The current air ventilation system for Xenon-133 use is described in our NRC License renewal dated March 13, 1985. In addition a Department ventilation evaluation is performed every six (6) months by our consulting physicist, the last one performed on November 5, 1984. Results of the last survey indicate a more than adequate negative pressure and CFM exhaust in the Imaging Room and fume hood in the Hot Lab. The results are enclosed. The next survey is due May 5. Full compliance is presently effective.

Item 2: As a result of a March 28 and April 17 meeting between David H. Woodbury, M.D. (proposed Radiation Safety Officer (R.S.O.)), William Hack, M.P.H. (consulting physicist), and Nuclear Medicine personnel, all applicable provisions of the regulations and conditions of our NRC License have been discussed. This includes the recent NRC inspection, consultant inspections, and NRC License renewal conditions. Full compliance is presently effective.

Item 3: As a result of an October 12, 1984 inspection by our consulting physics group, a proper worker instruction program has been instituted by written information required to be read and signed by all nursing, housekeeping, and other ancillary personnel. A video tape containing the identical information is being considered for future use. Lectures to nursing personnel regarding radiation safety will be provided by our physicist as needed in the future. Full compliance is presently effective.

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Item 4: Linearity testing of the dose calibrator is now performed on a quarterly basis as required by our License. A linearity test was performed February 26, 1985 and will continue on the required frequency. Proper linearity test procedure has been discussed by our physicist with the Nuclear Medicine technologists. All future linearity tests will be carried out to a minimum of 48 hours and have the proper $\pm 5\%$ limits calculated for each reading. All results will be reviewed on a quarterly basis. Also, dose calibrator daily constancy tests now include a Cs-137 and Co-57 reading. A Ba-133 has been purchased and will be used for annual accuracy testing in addition to the Cs-137 and Co-57. Full compliance is presently effective.

Item 5: David H. Woodbury, M.D. has been proposed as the R.S.O. On our License renewal application, presently in the Licensing Department at your office. Dr. Woodbury has been Chief of our Nuclear Medicine Section since 1968, is licensed to use radioactive material at several institutions, and received American Board of Nuclear Medicine certification in 1972. Full compliance is presently effective awaiting approval of our license renewal at your office.

Item 6: A review of required records relating to the radiation safety program was performed at the Medical Isotopes Committee meeting of December 19, 1984, as presented by the consulting physicist resulting from his October 12, 1984 inspection of licensed activities. A review of required recordkeeping was also performed at the April 16, 1985 committee meeting. A review of radiation safety and required recordkeeping will continue on a quarterly basis. Full compliance is presently effective. Our Medical Isotopes Committee has been expanded, and it is now known as the Radiation Safety Committee.

Item 7: A whole body film badge and finger TLD ring are presently being supplied to appropriate Nuclear Medicine personnel. The importance of wearing such devices has been discussed with the technologists. A review of exposure reports is performed on a quarterly basis by our consulting physicist for compliance with our ALARA program (Appendix O). Results are discussed at each Radiation Safety Committee meeting. Also, a monthly review will be performed by our R.S.O for compliance with ALARA and applicable 10 CFR 20 limits. Full compliance is presently effective.

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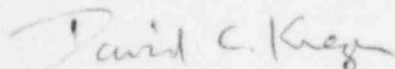
Item 8: A conversion factor of 100 DPM = 82.5 CFM was calculated by our consulting physicist, Mr. William D. Hack, for use during wipe testing with the well counter system we presently use. Areas exceeding 200 DPM/100 cm² contamination will be cleaned and re-tested. Full compliance is presently effective.

Item 9 (License No. 21-02936-02): The license for possession and use of the Co-60 teletherapy unit will be renewed shortly. Prior to use, a new Co-60 source will be put into the unit. Leak tests will be performed every six months as required on the new source and a leak test will be performed on the old source prior to shipment to the manufacturer.

The importance of no smoking, eating, or drinking in Nuclear Medicine or the Hot Lab has been discussed with appropriate technologists and other hospital personnel by both Dr. Woodbury and by our consulting physicists. Full compliance is presently effective.

If you have any questions concerning this response, please feel free to contact me.

Sincerely,



David C. Kreger
Executive Vice President
and Chief Operating Officer
Westland Medical Center

DCK/cn

cc: Dr. Woodbury
Dr. Ervin
Dr. Goldman - Radiation Safety Committee

VENTILATION EVALUATION

Location: Westland Medical Center

Date: 5 November 1984

Room: Imaging Area

EXHAUST

178 CFM (DESK)

218 CFM (CONSOLE)

277 CFM (A2)

316 CFM (CAMERA)

Total exhaust = 989 cfm

SUPPLY

82 CFM (L)

29 CFM

73 CFM

59 CFM (R)

Total supply = 293 cfm

NET VENTILATION

NEGATIVE pressure

696 cfm

COMMENT:

VENTILATION EVALUATION .

Location: Westland Medical Center

Date: 5 November 1984

Room: Hot Lab

EXHAUST

250 CFM (Fume Hood)

Total exhaust = cfm

SUPPLY

Total supply = cfm

NET VENTILATION

pressure cfm

COMMENT: