



REPLY TO NOTICE OF VIOLATION

*Cameron*

7500 State Road  
Cincinnati, Ohio  
45255 • 2490

December 22, 1992

613 • 624 • 4500

U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Holt:

Below please find the reply to the violation notice received by Mercy Hospital Anderson, NRC license #34-15046-01. The Mercy Hospital Anderson submits the following written statements pertaining to violations identified during the October 29, 1992 inspection by Mr. J. L. Cameron.

- A. VIOLATION: 10 CFR 35.22 (a) (3) requires that to establish a quorum and conduct business at least one half of the Radiation Safety Committee's membership must be present, including the Radiation Safety Officer and the management's representative.

Contrary to the above, on January 15, 1992, March 18, 1992, June 17, 1992 and September 16, 1992, the licensee's Radiation Safety Committee met and conducted business and the Radiation Safety Officer was not present.

RESPONSE: 10 CFR 35.22

R. Rolfes, MD was appointed Radiation Safety Officer in January 1992 by the hospital administration. An amendment change was overlooked until July 1992. Amendment #33 was received on August 19, 1992 approving R. Rolfes, MD as Radiation Safety Officer.

ACTION PLAN: R. Rolfes, MD will preside as Radiation Safety Officer at all Radiation Safety Committee meetings. Full compliance effective immediately.

A MEMBER OF

MERCY

HEALTH SYSTEM

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- B. VIOLATION: 10 CFR 35.51 (c) requires, in part, that a licensee check each survey instrument for proper operation with the dedicated check source each day of use.

Contrary to the above, as of October 29, 1992, the licensee routinely did not check its survey meter with a dedicated check source on days when the instrument was used. Specifically, the licensee conducted the checks weekly.

RESPONSE: 10 CFR 25.51

Survey meters will be routinely checked and logged on days when instruments are used.

ACTION PLAN: Procedure for full compliance has been implemented as of October 30, 1992.

- C. VIOLATION: 10 CFR 35.70(a) requires that a licensee survey with a radiation detection survey instrument at the end of each day of use all areas where radiopharmaceuticals are routinely prepared for use or administered.

Contrary to the above, as of October 29, 1992, the licensee did not survey with a radiation detection survey instrument at the end of each day of use all areas where radiopharmaceuticals are routinely prepared for use or administered. Specifically, the licensee surveyed at the beginning of each day of use.

RESPONSE: 10 CFR 35.70(a)

As of October 30, 1992 all areas where radiopharmaceuticals are prepared or administered will be surveyed at the end of each day.

ACTION PLAN: Procedure for full compliance has been implemented as of October 30, 1992.

- D. VIOLATION: 10 CFR 35.70(e) requires that a licensee survey for removable contamination once each week all areas where radiopharmaceutical are routinely prepared for use, administered, or stored.

Contrary to the above, as of October 29, 1992,, the licensee did not survey for removable contamination in all areas where radiopharmaceuticals are routinely stored.

RESPONSE: 10 CFR 35.70 (e)

The radioactive material storage area will be wipe tested, as well as surveyed, on a weekly basis. Results to be recorded.

ACTION PLAN: Procedure for full compliance implemented  
October 31, 1992.

- E. VIOLATION: 10 CFR 71.5 (a) requires that licensees who transport licensed material outside the confines of their plants or deliver licensed material to a carrier for transport comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR 170-189.

49 CFR 173.475 (i) requires that, prior to each shipment of any package, the shipper insure by examination or appropriate test that the external radiation and contamination levels are within allowable limits.

Contrary to the above, as of October 29, 1992, the licensee routinely delivered packages containing limited quantities of technetium-99m to a carrier for transport, and no tests had been made to assure that the external radiation and contamination levels were within allowable limits.

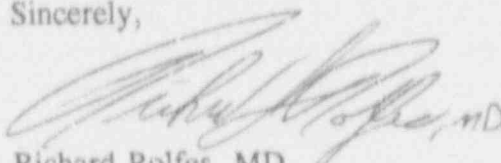
RESPONSE: 10 CFR 71.5

Suitcases being removed from the hospital will be surveyed and wipe tested prior to transport. Results will be properly recorded.

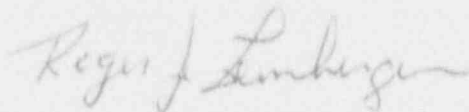
ACTION PLAN: Procedure for full compliance will be  
implemented as of December 21, 1992.

At the December 16, 1992 Radiation Safety Committee meeting, the committee reviewed stated violations and corrective action plans. Procedures were approved by the Radiation Safety Committee to assure future compliance to stated violations.

Sincerely,



Richard Rolfes, MD  
Radiation Safety Officer



Roger J. Leinberger  
Director  
Radiology Services

RJL/kaz

pc: Sister Suzanne Brennan  
President