

Columbia Health System, Inc.



Date: 9/23/96

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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

License No. 48-02417-01

Docket No. 030-03429

Reply to Notice of Violation

Columbia
Hospital, Inc.

Columbia Service
Corporation
of Wisconsin

Violation 1- Radioactive waste disposed of in a receptacle not
designed for radioactive waste.

Reason:

A technologist while cleaning an area, put a chuck absorbent
covering in a common receptacle without monitoring it.

Corrective steps:

Staff stated they are aware of policy and do attempt to place
all possible contaminated material in properly shielded and
marked containers. However, since this violation happened we
have restricted the common containers in the area and have
created more assessable proper radioactive waste containers. We
have instructed staff on the seriousness of this violation and
the necessity to follow the procedure which includes monitoring
ALL waste for radioactive contaminate.

Follow-up:

As part of our plan to make sure this doesn't happen again, we
have instituted a QA procedure to have all common containers in
area check for radioactive waste, AND logged, at the time of
area survey. These will be checked daily and occurrences will
be dealt with appropriately. This was not enforced consistently
in past but will be now until no occurrences are found on a
consistent basis. This will keep staff aware of problem and
help them routinely follow the procedure.

Compliance:

Immediate

Violation 2-Survey of shipping "limited quantity" packages to
radiopharmacy.

Reason:

In the procedure to ship the container, the technologist forgot
to wipe test container.

Corrective Steps:

Wipe testing out-going "limited quantity" containers, is part
of our procedure along with monitoring the outside of the
containers. It will be further stressed at our departmental
meeting.

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Followed up:

There will be periodic checks as part of our QA to determine if procedure is properly followed.

Compliance:

Immediate

Violation 3- Improper monitoring of incoming packages, Radioactive White I label, for radioactive contamination.

Reason:

The technologist monitored the package at 1 meter but did not wipe test it because he did not have reason to believe it was damaged or contaminated. This was because our policy stated to do wipe testing if there was a reason, after proper inspection, to suspect contamination.

Corrective Steps:

We have changed our policy on "opening incoming radioactive shipments" to include performing wipe testing on the external surface of all shipment containers.

Follow-up:

We will monitor this, as above for violation 2, in a QA monitor periodically to check continual compliance.

Compliance:

Immediate

Violation 4- Dose Calibrator linearity test range did not cover 3 dosages during that quarter.

Reason:

Source ordered for calibration was left and decayed down to 72mCi before it was used to perform the test.

Corrective Steps:

We have changed the amount used from 100mCi to 150mCi to perform the linearity test and cover the range needed.

Follow-up:

This will be monitored to make sure the test is done at time scheduled and not later.

Compliance:

Immediate

Violation 5- Use for medical use only byproduct material manufactured, labeled, packaged and distributed in accordance with a license issued pursuant to the regulations in 10 CFR part 35 and sections 32.72, 32.73, 32.74.

Reason:

Some of the sealed sources containing Cesium-137 used on Dec 1, 1995 and Aug 27, 1996 were transferred from St. Mary's Hospital of Milwaukee to Columbia Hospital of Milwaukee. Columbia Hospital and St. Mary's Hospital have a joint operating agreement under the same administration.

These sources were manufactured, labeled, packaged, and distributed by 3M Company with Calibration Certificates. The physicians who used these sources are authorized users at both Columbia and St. Mary's Hospital.

Before we transferred these sources, we made several phone calls to NRC Region III office and asked for advice: Do we need to do anything with our licenses in order to transfer Cesium sources from St Mary's to Columbia Hospital? The Answers were all NO. At that time, they did not interpret this transfer as a distribution. We also did not interpret this transfer as a distribution. These sources were manufactured, labeled, and distributed by the 3M Company. We transferred 7 Cesium-137 sources on Dec. 1, 1995 and 10 Cesium-137 sources on August 27, 1996 carefully following NRC and DOT regulations supplied by NRC region III in response to our phone calls. We do not agree with this citation. We do not interpret this transfer as a distribution. These sources were manufactured, labeled, and distributed by the 3M company.

Corrective Action:

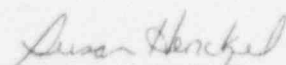
We will not use these transferred Cesium-137 sources in future cases until we obtain your approval. We are asking the NRC to approve the medical use of these Cs-137 sources for brachytherapy transferred from St. Mary's Hospital. These sources listed in Appendix A.


Compliance:

Immediate

Please call our RSO Dr. Chan if there are any further questions.

414 961 5492


Susan Henckel
Executive Vice-President/COO
Columbia Hospital


Yukong Chan
RSO, Physicist

Appendix A

Cesium-137 Sources List

YU KONG CHAN, Ph.D.

Columbia <> St. Mary's Hospital, Mil., Wis.

25-Sep-96

#	Physicsl form	Model (tubes)	Serial No.	Nominal strength (mg.Ra.eq.)	3M assay (mg.Ra.eq.)	Date purchased	phys. length (cm)	Active length (cm)	Current Strength (mg.Ra.eq.)
1	cesium tube	6D6C-CA	3M-15-3429	15	15.6	22, Mar.85	2	1.4	12.11
1	cesium tube	6D6C-CA	3M-15-3436	15	15.6	22, Mar.85	2	1.4	12.11
1	cesium tube	6D6C-CA	3M-10-5256	10	10.4	22, Mar.85	2	1.4	8.08
1	cesium tube	6D6C-CA	3M-10-5263	10	10.5	22, Mar.85	2	1.4	8.08
1	cesium tube	6D6C-CA	3M-10-2755	10	11.1	18, Jul.77	2	1.4	6.99
1	cesium tube	6D6C-CA	3M-10-2756	10	11.3	18, Jul.77	2	1.4	6.99
1	cesium tube	6500	3M-5-1977	5	5.52	10, Jan.92	2	1.4	4.96
1	cesium tube	6D6C-CA	3M-20-1798	20	20.9	18, Aug.81	2	1.4	14.79
1	cesium tube	6D6C-CA	3M-20-1835	20	20.9	18, Aug.81	2	1.4	14.79
1	cesium tube	6D6C-CA	3M-20-1886	20	20.9	18, Aug.81	2	1.4	14.79
1	cesium tube	6D6C-CA	3M-20-1860	20	20.9	18, Aug.81	2	1.4	14.79
1	cesium tube	6500	3M-5-2012	5	5.41	10, Jan.92	2	1.4	4.90
1	cesium tube	6501	3M-10-8028	10	11.06	10, Jan.92	2	1.4	9.74
1	cesium tube	6501	3M-10-8042	10	11.14	10, Jan.92	2	1.4	9.74
1	cesium tube	6504	3M-25-1549	25	26.54	10, Jan.92	2	1.4	23.89
1	cesium tube	6D6C-CA	3M-25-1049	25	25.3	22, Mar,85	2	1.4	19.42
1	cesium tube	6D6C-CA	3M-25-1054	25	25.4	22, Mar,85	2	1.4	19.42