

June 26th 1985

United States N R C
Region 1
631 Park Avenue
King of Prussia Pa 19406

License Nos: 37-01421-01
37-01421-04

Docket Nos: 030-02984
030-00465

Gentlemen:

Subject: Inspection No.85-01
Your letter dated June 13th 1985

This is in response to your letter (signed for John D. Kinneman) and is keyed to Appendix A of that letter.

A. Thyroid bioassay:

Two instances of lack of evidence that the required bioassay had been carried out.

The individual concerned has been rebuked for failure to follow the established policy. A Continuing Education session will be scheduled within two weeks for all technologists and physicians involved to reinforce this (and other) standing requirements. The Nuclear Medicine Department will in future inform the Radiation Safety Office of each time I-131 is to be administered, in millicurie amounts, with an estimate of the activity to be involved. In this way the R S O will be able to make spot checks at intervals so that any failure to perform a bioassay could be uncovered in time for such a test to be done with validity. The intent here is to reduce the possibility that detection of the omission may be too late for possible corrective action. While a 100% check by the R S O may be impractical, the Chief Technologist has the ongoing responsibility to ensure that all policies are adhered to on a daily basis. The ultimate responsibility lies with the individual handling the material, and this will be emphasized to all potentially involved, together with the potential for disciplinary action for failure to follow policy.

B. Molybdenum break through test:

While several failures to document that this test had been done were uncovered during the inspection, it is our belief that this violation is an omission to document rather than an omission of the test. This view is based on the general practice followed of assaying technetium-99m activity with the equipment for the molybdenum test being always present at that location. The inspector concurred that our belief was probably reasonable.

We have now modified the form of documentation of the technetium assay so that a specific entry for the molybdenum test has to be made. This change has been instituted, and will be covered in the CE meeting referred to above.

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C Quarterly physical inventory:

The method of recording the inventory of all sources and devices has been changed. The new method will specifically list all sources and devices by type, quantity and location instead of using such comments as "all sources present and accounted for". This change has already been introduced.

D. Medical Isotopes Committee - meeting frequency:

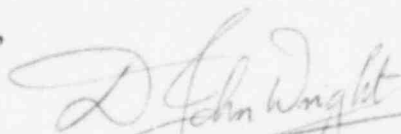
A prospective calendar for quarterly meetings has now been set up. While other meetings may be held at other times (e.g. a meeting on June 26th to consider this letter), meetings will now be held in January, April, July and October. Should there be no business for the Committee at any of the scheduled dates a notice to that effect will appear in the Minute record of the Committee.

We believe our response to the Notice of Violation should reduce the likelihood of such occurrences in the future.

For the record, following up on a paragraph on page 2 of your letter, waste disposal records have now been modified to include the results of monitoring surveys prior to waste disposal.

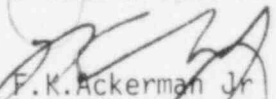
I would comment that the professional and helpful manner in which this inspection was carried out was most appreciated.

Sincerely,



D John Wright Ph.D. (Radiation Safety
Officer)

for



F.K. Ackerman Jr.
Senior Vice-President
Administrative Director,
Geisinger Medical Center.

DJW/djw