

InterSpect Corporation

January 13, 1997

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

Docket No. 030-33813
License No. 20-30212-01

To Whom It May Concern:

As instructed in your correspondence of December 20, 1996, we are forwarding this "Reply to a Notice of Violation". Our response is as follows:

A. The violation: As of November 1996, the licensee did not survey for removable contamination in the mobile van, an area where radiopharmaceuticals are routinely prepared.

1. The basis for disputing the violation: Contrary to the violation, radiopharmaceuticals are not routinely prepared in the van. To date all radiopharmaceuticals have been prepared under the authorized user license in the client's hospital nuclear medicine department.

2. The corrective steps that have been taken and the results achieved: There are no corrective steps necessary since radiopharmaceuticals haven't been prepared in the van. Once we do prepare radiopharmaceuticals in the van, 10 CFR 35.70(e) will be complied with.

3. The corrective steps that will be taken to avoid further violations: As discussed above, we do not believe this to be a violation.

4. The date when full compliance was achieved: As stated above, we were and are in compliance.

B. The violation: In the licensee's letter dated May 26, 1995, in paragraph 3c the licensee states, in part, "The C-RSO's (consultant-radiation safety officer) minimum time allocation on site will be several hours per week when the mobile unit is operational. Contrary to the above, the C-RSO's minimum time allocation on-site was not several hours per week, and the mobile unit was operational. Specifically, the C-RSO visits the site quarterly instead of weekly." 1/0 I 47

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1. The reason for the violation: To date, the van operates only under the authorized user license of the medical facilities it services. In addition, during this time period the service schedule has been sporadic with low patient volume. Consequently, this new commercial enterprise has not had the volume necessary to require more frequent C-RSO visits.

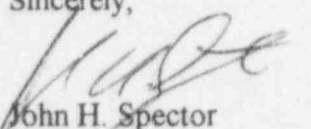
2. The corrective steps that have been taken and the results achieved: Paragraph 3c in our May 26, 1995 correspondence was based on a greater patient volume which should occur over time. At this time, we believe quarterly visits to be adequate.

3. The corrective steps that will be taken to avoid further violations: As the patient load increases the services of the C-RSO will be in more demand. While weekly visits have not been documented, the C-RSO telephones the InterSpect staff weekly in order to discuss and review recent activity.

4. The date when full compliance was achieved: Weekly C-RSO visits will be necessary when the number of patients scanned in the van increase. Telephone contact will continue to occur at least weekly.

Please contact me if questions arise regarding the above response.

Sincerely,


John H. Spector
Chairman
InterSpect Corporation

cc:
Regional Administrator, NRC, Region I
Robert J. Galibois, President, InterSpect Corporation
F. P. Castronovo, Jr., Ph.D./C-RSO