

Yale New Haven Hospital

20 YORK STREET, NEW HAVEN, CT 06504

Michael J. Bohan, Radiation Safety Officer
Radiological Physics - WWW 204
(203) 785-2950

October 26, 1996

Docket No.: 030-01244
License No.: 06-00819-03
EA No.: 96-321
Inspection No.: 96-001

Mohamed M. Shanbaky, Ph.D., Chief
Nuclear Materials Safety Branch
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Subject: Reply to a Notice of Violation - Inspection No. 030-01244/96-001

Dear Dr. Shanbaky:

Yale-New Haven Hospital (YNHH) submits the following response to the Notice of Violation dated September 24, 1996:

Restatement of Violation A.

10 CFR 20.1802 requires that the licensee shall control and maintain constant surveillance of licensed material that is in a controlled or unrestricted area and that is not in storage.

Contrary to the above, the licensee did not control and maintain constant surveillance of the licensed material that was in a controlled or unrestricted area and that was not in storage. Specifically, sometime between March 6, and July 26, 1996 the licensee lost five Iodine-125 seeds of 0.5 milliCurie each.

1. Reason for the Violation

Please refer to YNHH's letter reporting the loss to the NRC, dated September 6, 1996.

2. Corrective Steps that Have Been Taken and the Results Achieved

Corrective actions numbers 2, 3, & 4, detailed in Section F. of the September 6, 1996 report to the NRC, have been implemented. However, the counting jig mentioned in item 3 is currently in the design stage and under development.

3. Corrective Steps that will be Taken to Avoid Further Violations

Cabinet locks will be installed in the Radiation Safety Office Hot Lab to ensure the Iodine-125 source inventory is accessible to authorized individuals only.

4. Date when Full Compliance will be Achieved

The cabinet locks should be installed by November 30, 1996 and the counting jig will be implemented as soon as it can be designed and fabricated.

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Restatement of Violation B.

10 CFR 35.406 (b) requires, in part, that the licensee shall make a record of brachytherapy source use, which must include the names of the individuals permitted to handle the sources.

Contrary to the above the licensee did not make a record which included the names of the individuals permitted to handle the brachytherapy sources. Specifically, the name of the dosimetrist who signed out, and removed from storage, Iodine-125 sources on July 26, 1996, was not included on the licensee's record of individuals permitted to handle the sources.

1. Reason for the Violation

A record of authorized individuals was available, however, it had not been updated to reflect the addition of newly authorized personnel.

2. Corrective Steps that Have Been Taken and the Results Achieved

A new record of authorized individuals was completed which includes all new personnel.

3. Corrective Steps that will be Taken to Avoid Further Violations

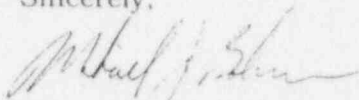
The Radiation Safety Office will be more careful in the future to ensure that the list is updated when new personnel are authorized to remove licensed materials from storage.

4. Date when Full Compliance was Achieved

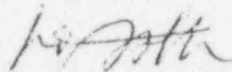
A new list was prepared on August 14, 1996 and it was signed and initialed by all authorized individuals by August 30, 1996. A copy of the new list is attached to this letter.

This completes YNHH's reply to the Notice of Violation dated September 24, 1996. If there are any further questions, please contact the Radiation Safety Officer at (203) 785-2950.

Sincerely,



Michael J. Bohan
Medical Health Physicist/RSO



Norman G. Roth
Vice President

Attachment: 1 page

cc: Robert Lange, Ph.D., Chairman, Radiation Safety Committee
Ravinder Nath, Ph. D., Director, Radiological Physics
George Pavlounis, III, Radiation Control Physicist, State of Connecticut,
Department of Environmental Protection, Bureau of Air Management

Yale-New Haven Hospital --- Radiation Safety Office

Individuals Authorized For Radioactive Materials Use

Department: Therapeutic Radiology

Name	Job Title	Signature	Initials
Agostinelli, Al G.	Med. Physicist	<i>Al G. Agostinelli</i>	(AG/RO)
Bohan, Michael	R.S.O.	<i>Michael J. Bohan</i>	(VB)
Bond, James E.	Med. Physicist	<i>James E. Bond</i>	JEB
Dodson, Anita	Dosimetrist	<i>Anita Dodson</i>	AD
Doolittle, Marlene	Dosimetrist	<i>Marlene Doolittle</i>	MED
Kimmett, James	Dosimetrist	<i>James C. Kimmett</i>	JK
Liu, Lizhong	Med. Physicist	<i>Lizhong Liu</i>	L.-L.
Nath, Ravinder	Director	<i>Ravinder Nath</i>	RN
Peschel, Charlene	Dosimetrist	<i>Charlene A. Peschel</i>	CP
Picone, James	Dosimetrist.	<i>James Picone</i>	JP
Pourang, Rahman	Med. Physicist	<i>Rahman Pourang</i>	RP
Richardson, Rick	H.P. Tech.	<i>Roderick L. Richardson</i>	R. L. R
Stanton, Richard (Ted)	Dosimetrist	<i>Richard T. Stanton</i>	RS
Trumpore, Sharon H.	Chief Dosim.	<i>Sharon Trumpore</i>	H.-S.T
Varela, Michael A.	Asst. R.S.O.	<i>Michael A. Varela</i>	MAV

The individuals named above are authorized by the Yale-New Haven Hospital Radiation Safety Office to handle sealed brachytherapy sources for clinical and/or research purposes. These individuals have been trained by the RSO in the appropriate radiation safety and inventory requirements of the hospital's license.

Signed By: *Michael J. Bohan*
Michael J. Bohan, R.S.O.

Date: 14-Aug-96