

**THE  
HONOLULU  
MEDICAL  
GROUP, INC.**



*The Best of Health*

**Kimberly J. Rocha**  
*Administrator,  
Chief Operating Officer  
Chair, Physician Recruitment*

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February 6, 1997

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

Re: Docket No. 030-11006  
License No. 53-16421-01  
EA 95-006

**REPLY TO A NOTICE OF VIOLATION**

To Whom it may concern:

Pursuant to the provisions of 10 CFR 2.201 and your correspondence dated January 23, 1997, The Honolulu Medical Group, Inc. (Licensee) is hereby submitting a written response to our Notice of Violation.

First, thank you for acknowledging that items (1) and (2) have been adequately addressed in letters dated October 7, 1992; January 31, 1995; March 13, 1995; April 14, 1995; February 23, 1996; April 19, 1996; and November 26, 1996.

With regard to items (3) and (4) we appreciate the NRC's suggestion that we supplement the posting of NRC form 3 with annual refresher training sessions. In order to provide for lasting corrective action we will be implementing the following:

- Modify the orientation program for nuclear medicine employees to include the dissemination of the whistleblower protection policies;
- Request that the radiation safety officer address the whistleblower protection policies at his quarterly staff meetings;
- Disseminate a handout to the nuclear medicine employees which communicates the whistleblower protection policies at the annual refresher training sessions.

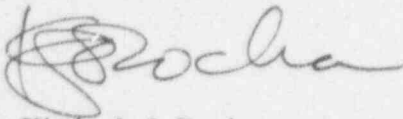
Each of these corrective actions will be implemented effective immediately. I have enclosed various documents to support the fact that these actions have been instituted and that The Honolulu Medical Group has incorporated it into its operational procedures.

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U.S. Nuclear Regulatory Commission  
January 6, 1997  
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I hope that this response satisfies The Honolulu Medical Group's reply to a notice of violation requirement. Should you have any further questions or require any more information, please feel free to contact me directly.

Sincerely,

A handwritten signature in cursive script, appearing to read "K. Rocha".

Kimberly J. Rocha  
Administrator / Chief Operating Officer

KJR:tn

cc: Richard L. Littenberg, M.D., Chief, Nuclear Medicine Department  
Regional Administrator, Region IV

Enclosures

COPY

**Kim Rocha**

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**From:** Kim Rocha  
**Sent:** Thursday, February 06, 1997 3:45 PM  
**To:** 'Karen Shimazu'  
**Subject:** Orientation  
**Importance:** High

Effective immediately, please modify new employee orientation to include the dissemination of the whistleblower protection policy to all nuclear medicine employees.

In order to document that this information was provided to the employee(s), please include this on the orientation checklist.

Although we have not had any recent nuclear medicine new hires, I would appreciate it if you would make this available to the current employees and document same.

Thank you.

COPY

**Kim Rocha**

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**From:** Kim Rocha  
**Sent:** Thursday, February 06, 1997 4:13 PM  
**To:** Amy Voss  
**Subject:** employee handout  
**Importance:** High

I need an employee handout that addresses the whistleblower protection policy. This handout must address the rights of the employee. This handout will be given at the annual refresher training course for nuclear medicine employees.

I would like a copy of the handout by Monday, February 10, 1997.

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# Memo

**To:** Scott Dube, Radiation Safety Officer  
**From:** Kimberly Rocha, Administrator / Chief Operating Officer  
**CC:** Nuclear Regulatory Commission  
**Date:** February 7, 1997  
**Re:** 10 CFR 19.11

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As you know, The Honolulu Medical Group has a responsibility to comply with 10 CFR 19.11 which provides for both policy and procedure to ensure that all nuclear medicine employees are made aware of their rights and freedom to raise safety concerns without fear of retaliation.

In addition to our annual refresher course and to the posting of NRC Form 3, I would like you to include a review of each employee's right to raise safety concerns and the means available to them to lodge any concerns that they may have regarding our nuclear medicine operation. Please incorporate this information into your quarterly safety reviews.

Thank you for your immediate attention and compliance in this matter.