

PARK  
MEDICAL CENTER  
October 25, 1996

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

RE: Reply to Notice of Violation  
License No. 34-02121-02

Dear Sirs:

This Letter is in reply to your notice of violation Docket No. 030-08207.

We offer the following explanation for recording of wipe test results in cpm per square cm rather than dpm per square cm, as noted in the notice of violation.

We would like to clarify two points regarding the notice of violation:

1. Our computer system is the Dupont Nuclear Medicine Manager, not the Mallinckrodt System.
2. The Nuclear Medicine Manager was never used to evaluate the results of wipe tests, it was to be for record keeping only. The CAPRAC Wipe Test Counter was and is used to evaluate all wipe tests.

The CAPRAC Wipe Test Counter will print in either dpm or net cpm, depending on the setup. Counts that exceed preset action levels (2000 dpm restricted / 200 dpm non restricted), print in red, allowing wipe test evaluation in net cpm. Since the NMM accepts only cpm, we elected to use net cpm for the print out. None of our wipe tests exceeded the preset action levels.

However, our investigation has revealed that the technologists neglected to add the background counts to the net counts before entering the results into the NMM. This printed out as below background for most of the result reports. As a result the error was overlooked. It does not appear that this affect our determination that none of the wipe test exceed presentation levels.

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*Corrective Steps:*

- Our R.S.O. immediately called our physicist consultant, after the inspection and discussed the problem.
- The physicist scheduled quarterly visit was the following Wednesday, 14 August 1996.
- The physicist and the R.S.O. concluded that the counts being entered were net counts (total counts of the wipe minus background) and that this number was again having background subtracted from it by the NMM program.
- This resulted in the zero dpm observed by the inspectors.
- During the evaluation it was also concluded that one technologist was entering the efficiency numbers for the wrong counting instrument.
- All technologists were instructed as to the correct method of entering the data and a new efficiency was calculated for the CAPRAC. This was completed 14 August 1996.
- All wipe tests completed since that date have been recorded correctly.
- The R.S.O. went back and randomly recalculated the dpm on several of the old wipe tests, using data retrieved from the computer (bkg counts plus net counts minus bkg counts times efficiency = dpm). The results all appeared to correspond to what was observed from the CAPRAC system. (no action levels were exceeded.)
- The R.S.O. and the physicist will review the actual data from the wipe tests results.
- The R.S.O. will review the data monthly, results reported excessively as below background will be investigated.
- The physicist will review them quarterly during her scheduled visit, any discrepancy will be documented in her quarterly report.
- All previously stored wipe tests will be recalculated and stored in the computer, this will be completed by 30 October 1996.

As a result of these measures, we have achieved and maintained compliance with our license. It is our sincere hope that these corrective actions are sufficient to address the notice of violation and will put this matter to rest.

Sincerely,



Neil Serle  
Chief Executive Officer  
Park Medical Center

CC: Regional Administrator  
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Nuclear Medicine File  
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