



Office of Safety

Ralph P. Lieto, M.S.E.
Radiation Safety Officer

Tel: (313) 876-7042
Fax: (313) 876-9142

March 3, 1997

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

REPLY TO A NOTICE OF VIOLATION

NRC License No. 21-04109-16
Docket No. 030-02043

Dear Sirs,

We are responding to the two violations identified from the inspection conducted January 13-15, 1997 at Henry Ford Hospital. The violations were stated in the letter dated February 6, 1997 from Cynthia D. Pederson, Director, Division of Nuclear Materials Safety. Our response is organized according to the format requested in the Notice of Violation letter.

We are not contesting the citation and believe that our response of corrective action is satisfactory. If further information is required, please contact the Radiation Safety Office at (313) 876-7042.

Stephen Velick
Chief Executive Officer, Henry Ford Hospital
Group Vice President, Henry Ford Health System

cc: Radiation Safety Committee
S. Hathaway

Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
Division of Nuclear Materials Safety
801 Warrenville Road
Lisle, IL 60532-4351

9703070035 970303
PDR ADOCK 03002043
C PDR



1 E07/11

Violation 1

The ambient dose rates were not measured quarterly in all areas where brachytherapy sources are stored. Specifically, a single survey was not performed of the brachytherapy source storage room between April 15, 1996 and October 7, 1996. The licensee failed to document the survey required by 10 CFR 35.59(h).

Reason for Violation

The survey was not done because of human oversight.

Corrective Actions and Results

We would like to clarify that the required quarterly surveys were performed through July 10, 1996 and on January 13, 1997. The person responsible for performing the survey has been doing the surveys properly since the regulation became effective. The missing survey should have been done in the fourth quarter around October 10, 1996. The January 13, 1997 survey was done prior to the unannounced arrival of the NRC inspection team. The survey results were consistent with historical results, (<0.1 mR/hr).

This Notice of Violation was discussed by the Henry Ford Hospital Radiation Safety Committee on March 3, 1997 for consensus of corrective actions.

Steps Taken to Avoid Further Violations

The Radiation Safety Office will conduct quarterly record reviews to monitor continued compliance. This will be initiated in April 1997.

Date When Compliance Will Be Achieved

Compliance was achieved on January 13, 1997 when the survey was next performed.

Violation 2

Surveys of area radiation levels are to be performed each week that the compactor or crusher is operated, i.e., when waste is processed. Waste is processed about every other week but area surveys were performed only monthly. The licensee failed to document the survey as required by the license conditions stated in Item 11.8 of the license application.

Reason for Violation

The Hazardous Materials (HazMat) personnel responsible for processing the low level radioactive waste failed to document performance of the radiation surveys of the work area each week that waste was processed. Independent area and wipe surveys were performed monthly by the Radiation Safety Office staff of the Processing Room. Because the RSO staff results indicated no problems and the HazMat team did not report any problems, no further follow-up was deemed needed.

Corrective Actions and Results

All waste processing was immediately suspended on January 15, 1997 until all personnel involved in the waste pickup and processing were inserviced, and survey procedures were clarified and revised. All personnel including supervisors were inserviced on January 27 and 28, 1997 by the Radiation Safety Officer. The instruction included revised procedures. The revised procedure is that a survey must be done of the person processing the waste and of the work area at the end of each day that waste is processed. Currently waste is processed once every 1-2 weeks. A copy of the log for recording these surveys is enclosed.

This Notice of Violation was discussed by the Henry Ford Hospital Radiation Safety Committee on March 3, 1997 for consensus of corrective actions.

Steps Taken to Avoid Further Violations

The Radiation Safety Office staff will monitor waste processing and survey logs to verify that the surveys are being properly done.

Date When Compliance Will Be Achieved

Compliance was achieved on January 28, 1997 and communicated to the chairman and management representative of the Radiation Safety Committee. A copy of the communication is enclosed.

DATE _____

NOTE: Any reading >2.0 mR/hr for an Unrestricted Area must be reported immediately to the Radiation Safety Officer and appropriate action taken to reduce reading to below 2.0 mR/hr.

3

Henry Ford Hospital
Radiation Safety Office

Communication

TO: Len Lutter, Ph.D. , RSC Chair
Jan Ableson

FROM: Ralph P. Lieto
Radiation Safety Officer *RP Lieto*

DATE: January 28, 1997

RE: HazMat Survey - NRC Citation Follow-up

On January 27 and 28, 1997, I conducted a one hour inservice of the HazMat team members with duties that include the pickup and processing of radioactive waste from the laboratories. Attendance list is attached. The purpose was to implement corrective actions to a probable NRC citation for inadequate survey frequency when processing radioactive waste. The deficiency was cited during an unannounced inspection January 13-15. The inservices addressed the following:

1. Summary of NRC inspection regarding review of radioactive waste management program.
2. Summary of NRC inspector's interview of HazMat member (Dan Kelly).
3. Survey corrective action:
 - * reviewed survey form to be completed each time radioactive waste is processed;
 - * reviewed survey meter operation;
 - * reviewed areas to be surveyed and making log entries by HazMat team member;
 - * emphasized wearing gloves, mask, and disposable gown;
 - * emphasized importance of surveying hands, clothing, shoes, workspace;
 - * RSC staff will review survey log monthly for completed entries.
4. Reported that NRC will return in 6-8 months for another inspection; certain to followup citation; possible interview of HazMat member(s).
5. Hands-on review of survey meter use and operation with question & answers.

cc: J. Matson
E. Harris