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Group Health Association, Inc.
Department of Laboratories, 1709 New York Avenue, N. W.
Washington, D. C. 20006

Director of Laboratories
Penn Lupovich, M. D.

August 20, 1985

Mr. John D. Kinneman, Chief
Nuclear Materials Safety Section A,
Division of Radiation Safety and Safeguards
Nuclear Regulatory Commission, Region I

Dear Sir:

This letter refers to your letter of August 1, 1985, with regard to the recent inspection of our laboratory, license #08-16962-01.

I was not present in the laboratory the day of the inspection but have met with the Chief Technologist and the supervisors of the section which were inspected. They have seen the inspection report and your letter and I have discussed the report with them.

First, let me tell you that there will be no recurrence of the glove-wearing incident that your inspector observed. It is our collective understanding that we truly did not understand that gloves were to be worn when going to the refrigerator, however, as we discussed this matter it became rapidly clear to us that anytime isotope is handled gloves were and are to be worn. There is no misunderstanding now about when and where and under what conditions appropriate protective measures are to be taken. Let me assure you that gloves have been, and are at all times worn during the performance of tests, clean-up and the handling of bulk isotope. What caused the problem was not wearing gloves when the supervisor reviewed the inventory in the refrigerator with the inspector. Again, let me point out it was not an oversight but, simply a matter of ignorance on our part based upon our collective failure to think through the whole idea of protective measures. (Again, the value of inspections are brought home.) This matter has been corrected and stands corrected and this gap in knowledge having been filled, will not occur in the future.

Approximately two weeks ago, I requested a review of our laboratory by Health Physics Services Incorporated of Rockville, Maryland. The Director of Technical Operations, Catherine T. Haney, reviewed our operation with instructions that I wanted to know everything bad, good and otherwise with regard to the operations of the RIA section. I received her report about two days ago and find it to be very helpful and enlightening with regard to some of the details with regard to the regulations of the operations of our laboratory. After reviewing Ms. Haney's consultation and suggestions, I will address a request for certain changes that we think will improve our

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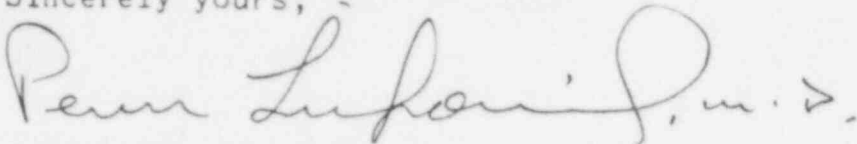
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operation and ability to function safely and correctly, in a letter to you in the near future for your consideration.

I hope that the recent inspection will not detract from our overall efforts to provide high quality laboratory work to our patients in Group Health for the lowest possible costs. It should be noted that Group Health Association is a healthcare cooperative owned by the patients. All the employees are salaried, including myself, and there is no motivation to cut corners for personal gain. There is no reason to be sloppy in our work or to cause violations to take place which might be questionable. I can only tell you that we try to achieve the highest standards, and occasionally, we find that we can do better. This is one such occasion.

We are appreciative of the inspection and feel that inspections are not of significant value unless we learn from them. In this case we have learned again. Quod Erat demonstratum.

Sincerely yours, -

A handwritten signature in cursive script, reading "Penn Lupovich, M.D.", written in dark ink.

Penn Lupovich, M.D.,
Director of Laboratories

PL/dlj