

April 4, 1997

United States  
Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

RE: "Reply to a Notice of Violation"  
Onsite Inspection: February 11, 1997  
Licence Numbers: 21-00943-03 and 21-00943-04

Document Control Desk:

The following is in response to the letter addressing the findings of an onsite inspection conducted on February 11, 1997, at St. Joseph Mercy Hospital in Ann Arbor, Michigan for license numbers 21-00943-03 and 21-00943-04.

**License No. 21-00943-03**

**Violation 10 CFR 20.1801 - Unauthorized Removal of Licensed Material**

**Situation**

To prevent the unauthorized release of waste products contaminated with radiative materials our facility has sensitive radiation detection equipment at our waste handling dock. All trash that leaves the facility passes through this survey point. However, on November 20, 1996, our contracted waste disposal company that monitors for radioactivity detected a waste container with minimal activity. Hence, the landfill contractor immediately reported the situation to us so we could retrieve the waste and store it for decay.

**Reason for the Violation**

The low level of the exposure on the surface of the trash was such that the radioactive material went undetected through our detection point. Although, our equipment is more sensitive than that used by the landfill the maximum distance an item may be surveyed at is greater than the landfill. Hence, there is a variation in the two detection methods.

To improve the detection ability, the geometry of the detector placement is scheduled to be changed. The maximum distance between the waste and the detector will be reduced by half. An opposing orientation will be added. The time the material stays within the detection window will be lengthened.



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Corrective Steps and Results

Until this is completed, a second manual survey will continue to be performed, as it has since our onsite evaluation. This has aided us in isolating radioactive contaminated trash from the regular waste stream. A reminder has been issued to the waste handlers of the importance of a thorough radioactive survey of all waste material prior to shipment.

Compliance Achieved

The new orientation will survey the trash at a closer distance than before. The trash will be surveyed from two orientations. This will make detection of radioactivity at least four times greater than before. The installation should be completed by April 30, 1997.

License No. 21-00943-04

Violation 10 CFR 35.22(a)(3) - Radiation Safety Committee Quorum

Situation

Facility has two Radiation Safety Officers, one for each license.

Reason for the Violation

The facility Radiation Safety Committee meetings were conducted without the presence of the Radiation Safety Officer for license number 21-00943-04.

Corrective Steps and Results

The presence of both of the Radiation Safety Officers will be criterions for determining a quorum for future Radiation Safety Committee meetings.

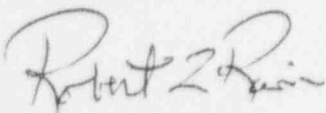
Compliance Achieved

At the Radiation Safety Committee meeting on March 19, 1997, business was conducted with the presence of both facility Radiation Safety Officers.

Closing

If you have any questions, you may directly contact Rayma L. Bilicki, M.S. at (313) 712-1325 or (313) 712-3052.

Sincerely,



Robert L. Ravin  
Vice President

cc: Regional Administrator - Region III  
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