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Affiliated with the
University of Medicine and
Dentistry of New Jersey

Member of the
University Health System
of New Jersey

HACKENSACK UNIVERSITY MEDICAL CENTER

REPLY TO A NOTICE OF VIOLATION

Date : April 3, 1997

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

Reference Docket Number : 030-02452, 030-00345
Reference License Number : 29-02641-03, 29-02641-04

To whom it may concern,

This letter is in response to the notice of violation sent to our facility on March 14, 1997.

1. Response to infraction against 10 CFR 35.315(a)(8)

   a. Our facility was under the misconception that bioassays needed to be performed only when administering Iodine 131 > 30mCi in a liquid form. Hence, bioassays were not performed because our facility only administers solid capsules during therapeutic administrations.

   b. A policy and procedure regarding bioassays is currently in place, see enclosure. All personnel directly involved with therapeutic administrations of Iodine 131 > 30 mCi have been informed about the content of this policy, see attached signature sheet.

   c. Following a therapeutic administration of Iodine 131 > 30mCi, the Radiation Safety Officer shall review and sign the bioassay calculation sheet, ensuring full compliance.

   d. The last therapeutic administration of Iodine 131 > 30mCi was in November 1996. Hence, our facility will be in compliance during the next administration.

2. Response to infraction against 10 CFR 35.51(a)(1)

   a. During survey meter calibrations two Ludlum 14C surveys meters were not tested on the x1000 scale. Calibrating the Ludlum 14C survey meters on the x1000 scale with current procedures would require accurate positioning

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of the survey meter on the test stand to within 6 inches of the source. The current test stand utilized will not allow positioning of the survey meter at this distance.

b. During future calibrations the survey meters will be checked at two points on the x1000 scale by removing the meters from the test stand and positioning the probes by hand. In order to avoid unnecessary exposure, the active source will be kept shielded until the probes are positioned properly.

c. The results of the semi-annual survey meter calibrations shall be reviewed and signed by the Radiation Safety Officer, as well as be reported to the Radiation Safety Committee.

d. The next survey meter calibration is scheduled for May 1997.

3. Response to infraction against 10 CFR 35.647(a)

a. The five year inspection for the Co^{60} teletherapy unit was originally scheduled for December 1996. However, internal scheduling delays resulted in exceeding the five year limit.

b. Our facility has recently undergone a source exchange for the Co^{60} teletherapy unit. The five year inspection for the teletherapy machine was performed on March 6 and 7th. I have enclosed a copy of the five year inspection for your records.

All machine operators have been instructed to perform the following tasks :

1. Monitor the source position during patient treatments.

2. Verify that the source has been fully deployed upon treatment initiation.

3. Verify that the source has been fully retracted upon termination of the treatment.

I have also enclosed a copy of the signature sheet that was used for the above in-service.

c. A schedule of dates regarding license renewals, and five year inspections will be maintained by the Radiation Safety Officer and discussed during Radiation Safety Committe meetings when appropriate.

d. Currently in compliance.

If you have any questions regarding this, please contact our Radiation Safety Officer, Mr. Eric Weiss, at (201) 996-2548.

Thank you for your consideration in this matter.

Sincerely yours,

Daniel S. Messina, FACHE
Assistant Vice President of Operations