

March 13, 1997

Mohamed M. Shanbaky, Ph.D.,
Chief Nuclear Materials Safety Branch 1
Division of Nuclear Materials Safety
King of Prussia, PA 19406

Dear Dr. Shanbaky:

RE: Wills Eye Hospital
Radioactive License No. 37-00783-05

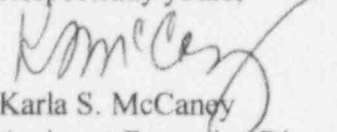
This is a response to your concern of possible non-compliance as a result of information submitted to the N.R.C. on March 3, 1997.

The attempt of the physicists/R.S.O. to assist the Gamma Knife service personnel in troubleshooting is not unusual or undesirable. It is not an attempt to **repair** the unit but to help in some form of diagnosis so that, if necessary, the proper machine parts can be ordered, just to give one example. There was no way of knowing, at first, whether the flashing light was a result of a faulty bulb connection or a problem with the mechanism that causes the light to flash. We did **not** replace any or attempt to replace any machine part. This troubleshooting procedure often reduces the machine downtime considerably, especially when there are patients waiting to be treated. We regarded our action as similar to the fine adjustment of the Gamma Knife helmet microswitches which we are forced to make periodically. Also it is important to note that the Gamma Knife unit was **not** in use at the time the flashing light was observed. The bed was fully retracted, the radiation door to the unit was closed, and therefore, the light should not have been flashing at all.

We did not regard the troubleshooting, with the engineers licensed to do repairs, as an act of non-compliance. On the other hand, if the N.R.C. defines our action as verging upon non-compliance, we will of course, make the necessary changes to our present policy.

We hope that this provides a satisfactory explanation of our actions and reconfirms our commitment to continued compliance in the future.

Respectfully yours,


Karla S. McCaughey
Assistant Executive Director

MAR 21 1997

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