

18 May 1965

Mr. Donald I. Walker, Director
U. S. Atomic Energy Commission
Division of Compliance, Region IV
P. O. Box 15266
Denver, Colorado 80215

Dear Mr. Walker:

In compliance with your letter dated 11 May 1965, the following information is forwarded.

Items a., b., and c. will be answered as a group since they pertain to the same basic violation of AEC regulations. Actually, the AEC License for Fitzsimons General Hospital permits a maximum of 200 millicuries of any isotope with atomic number 3 to 83 on the Post for animal and in vitro studies. However, the Preventive Medicine Section of The Surgeon General's Office has insisted that the AEC place restrictions on the amount on the Post for human use. These lesser amounts were the ones which resulted in the violations cited in a., b., and c., specifically I-131 Cholografin, 5 millicuries (permitted 2 millicuries), I-125 Human Serum Albumin, 2 millicuries (permitted 1 millicurie), Chromium 51, 5 millicuries (permitted 4 millicuries). The infractions were the result of a misunderstanding of all members of the Radioisotope Committee who logically assumed that the total amount permitted on the Post was the limiting factor and that any part could be used in either radioisotope area. However, the inspection by Mr. George H. Smith on April 26, 27, and 28, 1965, discovered this error and the Radioisotope Section henceforth will not exceed the maximum amounts permitted for human use, pending changes in the AEC License. A request will be forwarded to amend the AEC License to permit a more realistic procurement of the quantities of radioisotope material.

The use of EB-86 and C-14 at the summit of Pikes Peak, Colorado, on September 22, 1964, was clearly a violation since their use was authorized solely by the Research and Nutrition Laboratory at Fitzsimons General Hospital. This violation was discovered on 6 November 1964. After a prompt and thorough investigation, it was determined that the investigators who had used these isotopes had made the invalid assumption that the authority to use these isotopes by the Research and Nutrition Laboratory

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was sufficient to permit their use in a research project by investigators of this unit at a place other than the unit station at Fitzsimons General Hospital. It was determined that the primary breakdown occurred as a result of the unscheduled absence of the Chief of the Radioisotope Section. His replacement apparently did not completely possess the administrative know-how or depth of knowledge to insure complete enforcement of all the regulations pertaining to radiation safety. Accordingly, two additional individuals currently employed by USAMRNL who have had extensive training in radiation safety will substitute for the Chief of Radioisotopes if it is necessary for him to be absent. In addition, all Division Chiefs, USAMRNL, were informed of this incident on 27 Nov 1964. Although there are posted copies of CFR, Title 10, Part 20, and the USAMRNL Radioisotope SOP at the Radioisotopes Laboratory and at other locations throughout the USAMRNL, each individual with radioactive material was required to re-familiarize himself with these regulations. The above measures were discussed with Mr. George H. Smith of the Atomic Energy Commission on 26 April 1965. He was of the opinion that the corrective steps taken were adequate to properly control the use of radioactive material in the laboratory. In particular, the qualifications of the two persons who would serve as substitutes in the absence of the Chief of the Radioisotope Section were evaluated. Mr. Smith felt that either of these individuals could properly supervise our radioisotope activities.

Sincerely yours,

CLINTON S. LYTER
Major General, MC
Commanding

