

Bartlett Memorial Medical Center, Inc.

DICK ROBINSON, Administrator

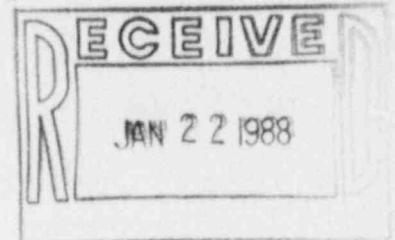
519 SOUTH DIVISION

SAPULPA, OKLAHOMA 74067

918 - 224-4280

January 18, 1988

William L. Fisher, Chief
Nuclear Materials and Emergency
Preparedness Branch
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



Docket 30-09214/87-01
License 35-15500-01

Gentlemen:

This is in response to the "Notice of Violation" which we received as a result of Mr. Ricketson's inspection of December 1, 1987.

We propose to make the following changes in our Nuclear Medicine program in order to eliminate the possibility of future violations of NRC regulations:

1. All records will be made available to our consulting physicist so that he may review them during his routine visits to our facility. Previously, he did not have access to some of our records as they were locked in an office. He will notify the hospital administration of the deficiencies in our program in addition to the usual notification of the Radiology Department supervisor.
2. The nuclear medicine technologist will prepare a calendar showing the dates of all required tests and meetings for each year. This will help ensure that various tasks are done on time.
3. The Radiation Safety Officer will review each month the records that have been generated that month and the calendar of tasks to insure that NRC requirements are being met.
4. All of our record keeping will be revised in order to make any particular record more easily retrievable. Similar records will be kept in one place in chronological order. This will make it easier for the Radiation Safety Officer and the consulting physicist to check the records.
5. We have a small Nuclear Medicine program and we do not perform radioisotope studies every day. However, we have always had 100 mCi of Tc-99m delivered each morning to be used for studies ordered during the day. This necessitated record keeping of isotope receipt and usage and area surveys even when no patient studies were performed. We have discontinued this routine shipment and only order unit doses as patient studies are ordered. This will reduce some of the record keeping that is required of our employees.

These changes will result in deficiencies being uncovered sooner and in the hospital administrative being more aware of possible problems.

IC-88-016

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In response to the specific violations:

1. Meetings of the Radiation Safety Committee have been scheduled for a specific day each quarter rather than waiting for the quarter to arrive and then deciding when to call a meeting. In addition I have clearly stated to the Radiation Safety Officer that committee meetings are to be held each quarter. Since the committee minutes will now be available to our consulting physicist, I will be advised if meetings are not held each quarter.
2. & 3. I have directed the nuclear medicine technologists to perform the required tests and to maintain the appropriate records. The Radiation Safety Officer will check these records on a monthly basis. We feel that this will prevent the record lapses which Mr. Ricketson discovered.
4. Our consulting physicist found wipe test results among his records for the dates 12/19/86, 04/06/87 and 08/29/87. The record for 12/19/86 was the original which explains why we did not have the record. Those of last April and August were copies and neither he nor we know what happened to the original. We feel that we are in compliance with the wipe test requirement but not the record keeping requirement. Copies of these wipe test results are attached. In the future, our copy of wipe test records will be available for him to check to ensure that we have records of all of his measurements. Our Radiation Safety Officer will check these records on a monthly basis and will use the calendar of dates of required tests to ensure that our records are complete.
5. Since we started getting radioactive material from a commercial radio-pharmacy, the amount of trash generated by the nuclear medicine program has been very small. Our consulting physicist has commented on the lack of a record of radioactive trash disposal three times in the past year. He feels that the same trash has been present in the hot lab for the past year at least. Our nuclear medicine technologist does not recall any trash disposal within the last several years. Therefore, we are not sure that we have violated any regulations concerning record keeping of trash disposal since there may have been no disposal. Since the inspection by Mr. Ricketson, all of the trash in the hot lab has been surveyed, found to be at background levels, disposed of, and an appropriate record made. Monthly checks by the Radiation Safety Officer should ensure that this record is continued for each trash disposal.

Sincerely yours,



W.D. Robinson
Administrator

WDR/fs

Enclosures

Wipe Test

12/29/87

Source # 3560381A-03

Baetle Memorial Medical Center

Instrument: Picker Spectro Scaler II (SJ # 08633)

HV 1530

LLD 25keV

ULD off

Time 1 min

Bkg - 198 cts

Wipe 224 cts

Std (.055 uCi Cs137 on 6/63; now .031 uCi) - 18615 cts

$$\frac{.031}{18615} \times 26 = .0004 \text{ uCi}$$

Test Negative

Keith M. Jones, PhD
Radiation Physicist

Baetlott Memorial Medical Center

Wipe Test Results

8/24/87

Source Wipe - 3560381A - 0.3 CS - 137

Pickup Spectro Scaler III - St. John Medical Center, L.A.

HV - 1500 VTS

LID - 25K20

ULD OFF

Time 60 sec

BKG - 223 } N.T. 14

Wipe 237

Std (.055 uCi; CS 137 on 6/63, now .0316 uCi) - 19,903

$$\frac{141}{19,903} \times 0.316 = .0002 \text{ uCi}$$

Test Negative

Keith M. Jones, PhD
Radiation Physicist

Baetlott Memorial Medical Center

Wipe Test Results

8/29/87

Source Wipe - 3560381A - 0.3 Cs - 137

Pickup Spectro Scale, III - St. John Medical Center, Lab

HV - 1500 volts

LID - 25kV

ULD off

Time 60 sec

Bkg - 223 } NT 14
Wipe 237

Std (.055 uCi Cs 137 on 6/63, now .0316 uCi) - 19,903

$$\frac{141}{19,903} \times 0.316 = .0002 \text{ uCi}$$

Test Negative

Keith M. Jones, PhD
Radiation Physicist

BARTLETT Memorial Medical

Wipe Test Results

4/6/67

Source Wipe -35603814 -03 (Cs-137)

Pickard Spectro Scaler III

HV - 1510

LED - 25KV

ULID - 0.5+

Time - 60Sec

BK5 - 218
Wipe - 247 } NOT 29

STD - (.055 uCi Cs 137 on W63, now .0317 uCi) - 20061

$$\frac{29}{20061} \times .0317 = .000046 \text{ uCi}$$

Test Negative

Kurt Jones, M.D.
Rad. Physicist

BARTLETT Memorial Medical

Wipe Test Results

4/6/67

Source Wipe - 3560381A - 03 (Cs-137)

Pickup Spectro Scaler III

HV - 1510

LLD - 25KV

ULD - 0.5+

Time - 60 Sec

BK5 - 218
Wm - 247 } N.T. 29

STD - (.055 uCi Cs 137 on W63, now .0319 uCi) - 20061

$$\frac{29}{20061} \times 0.319 = .00046 \text{ uCi}$$

Test Negative

Keith Jones, M.D.
Rad. Physicist

Wipe Test
Bartlett Memorial Medical Center
Dec 19, 1986

Source wiped: # 3560381A-03 Cs-137
NEN NES-356

Instrument: Picker Spectro Scanner III

HV - 1520

LLD - 25KLV

ULD - off

Time - 1 min

Std. .055 uCi Cs-137 on 6/63

Now .032 uCi

Readings
Wipe - 236
Bg - 229
Std - 19,950

$$\frac{7^*}{19,950} \times .032 = .00011 \text{ uCi}$$

Test Negative

K. Jones, PhD

Wipe test
Bartlett Memorial Medical Center
Dec 19, 1966

Source wiped: # 356028A-03 Cs-137
NEN NRC-350

Instrument: Aiken Spectro Scaler III

HV - 1520

LED - 25kV

LED - OFF

Time - 1 min

Std. .055 uC, Cs-137 on 6/63

Now .032 uC,

Readings W pt - 236
 BK - 200

Std - 19,950

$$\frac{7}{19,950} \times .032 = .00011 \text{ uC.}$$

Test History

K. Jones, PhD