

JAN 22 1988

Docket No. 3003557

St. Francis Medical Center
2230 Liliha Street
Honolulu, Hawaii 96817

Attention: Mr. Michael Matsura
Administrator

Gentlemen:

Thank you for your letter dated December 31, 1987, informing us of the steps you have taken to correct items which we brought to your attention in our letter dated December 7, 1987. Your corrective actions will be verified during our next inspection.

Your cooperation with us is appreciated.

Sincerely,

Original Signed

James L. Montgomery, Chief
Nuclear Materials Safety and
Safeguards Branch

cc w/cy ltr dtd 12/31/87:
T. Anamizu, Dept. of Health

bcc w/cy ltr dtd 12/31/87:
RSB/Document Control Desk (RIDS) (IE05)
B. Faulkenberry
J. Martin
J. Zollicoffer

bcc w/o cy of ltr dtd 12/31/87:
M. Smith

Region V

REQUEST COPY	REQUEST COPY	REQUEST COPY
YES / NO	YES / NO	YES / NO
		SEND TO PDR
		YES / NO

FPang/norma
1/21/88

BThomas
1/21/88

JLMontgomery
1/22/88

8802020242 871231
REG5 LIC30
53-11966-01 PDR

IE05.11



SAINT FRANCIS MEDICAL CENTER HONOLULU HAWAII SINCE 1927

RECEIVED
NRC
REGION V

1988 JAN 11 A 9:42

December 31, 1987

License No. 53-11966-01

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: Reply to a Notice of Violation

Dear Sir:

Pursuant to your letter dated December 7, 1987 concerning NRC Inspection and Notice of Violation, enclosed is St. Francis Medical Center's Reply to a Notice of Violation.

Sincerely,

Michael Matsuura
Administrator

cc: Regional Administrator
Region V

~~8801110363~~ 4pp.

REPLY TO A NOTICE OF VIOLATION

St. Francis Medical Center
Nuclear Medicine Department
2230 Liliha Street
Honolulu, Hawaii 96817

Docket No. 030-03557
License No. 53-11966-01

VIOLATION A:

10 CFR 20.207 states that licensed material shall be secured from unauthorized removal from the place of storage, or be under the constant surveillance and immediate control of the licensee.

Contrary to the above requirement, at the time of the inspection, the Nuclear Medicine laboratory where licensed material is used and stored was unattended and unlocked.

This is a Severity Level IV Violation (Supplement IV).

CORRECTIVE ACTION:

The isotope storage room, the area in violation that was left open at the time of inspection has been reviewed with all personnel in the department as to the importance of it being closed and locked at all time when not in use.

The RSO and Chief Nuclear Medicine Technologist will monitor the isotope storage room to see that this incident is not repeated.

STATUS:

Closed.

VIOLATION B:

License Condition 20 requires, in part, that except as specifically provided otherwise by this license, the licensee shall possess and use licensed material in accordance with statements, representations, and procedures contained in application dated December 7, 1984.

1. The application states, in part, that each dose calibrator shall be tested for accuracy on an annual basis and that measured activity differing from the decay activity of the reference source by greater than plus or minus 5% shall require adjustment or repair of the dose calibrator.

Contrary to the above requirement, the annual accuracy test conducted on November 19, 1986, exceeded 5% for the barium-133 reference source, and no action was taken. This is a repetitive violation.

This is a Severity Level IV Violation (Supplement VI)

CORRECTIVE ACTION:

Since the NRC inspection, the annual calibration for the Capintec Dose Calibrator (CRC-12) was performed by Mid Pacific Medical Physics (Health Physics Consultant). The Ba-133 calibration source for the second time registered a 6.2%. In discussing the problem with

St. Francis Medical Center
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Mid-Pacific Medical Physics, it was learned that other CRC-12 calibrators that they calibrate also had a +6% reading. They have written a letter to Capintec Inc. regarding the problem in order to determine whether the problem is one of source or calibrator. A copy of the letter is enclosed.

It appears that the calibrator is functioning properly since the two other sources, CO-57 and Cs-137 are within the allowable limits.

STATUS:

St. Francis Medical Center will forward a copy of Capintec's response to our inquiry as soon as we receive it.

2. The application states, in part, that ancillary personnel whose duties require them to work in the vicinity of radioactive materials will receive annual instruction pertinent to their duties.

Contrary to the above requirement, annual refresher training for ancillary personnel had not been given during 1985 and 1986. This is a repetitive violation.

This is a Severity Level IV Violation (supplement VI).

CORRECTIVE ACTION:

A schedule of annual refresher training for ancillary personnel has been established by the RSO and the Chief Nuclear Medicine Technologist. Management will monitor the refresher training as part of its semi-annual audit to insure compliance.

STATUS:

Management to monitor as part of semi-annual audit.

VIOLATION 3:

License Condition 17B. requires, in part, that prior to disposal as normal waste, radioactive waste shall be monitored to determine that its radioactivity cannot be distinguished from background with typical low level laboratory survey instruments.

Contrary to the above requirement, at the time of inspection, a piece of radioactive contaminated gauze measuring approximately 50,000 dpm and a radioactive contaminated label measuring approximately 20,000 dpm were found in the nonradioactive trash can located in the Nuclear Medicine Department's radionuclide laboratory.

This is a Severity Level IV Violation (Supplement VI).

CORRECTIVE ACTION:

In order to prevent future mishandling and classification of radioactive waste in the radioisotope storage room, only one trash can will be utilized and it will be classified as radioactive. In this way all

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waste that is removed from the room will be subject to monitoring prior to disposal.

STATUS:
Closed.