

June 30, 2022

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

Subject: Reply to a Notice of Violation NRC Inspection Report 030-13337/2022-001

To whom it may concern:

Re: Docket No. 030-13337  
License No. 53-17797-01

This is in regards to the NRC Inspection Report and Notice of Violation dated June 13, 2022 resulting from the inspection performed on April 14, 2022, by Janine Katanic, PhD.

Violation A. on report of June 13, 2022:

Ensure that written directives for administrations of sodium iodide iodine-131 contained the required information. On two written directives for administrations of quantities greater than 30 microcuries of sodium iodide iodine-131, the written directives did not indicate the units of activity to specify the dosage.

Corrective Actions:

- The physicians were counseled in writing to indicate the units of activity in the written directive to specify the dosage. Dr. Chon, Radiation Safety Committee Chair, met with each of the physicians individually to review the requirements.
- The technologists were also directed to verify that the units of activity were completed in the written directive by the physician.
- The RSO will carefully monitor compliance, during the quarter and at the Quarterly Audit.
- The clerk who processes the physician order will check to make sure the units of activity are completed in the written directive.

Violation B. on report of June 13, 2022:

Perform a prospective evaluation demonstrating that occupationally exposed individuals were not likely to receive, in one year, a radiation dose in excess of NRC's limits, or provide dosimetry to the individuals. The inspection finding was that contracted or temporary nuclear medicine technologists need to have dosimetry badges issued through Kuakini Medical Center

(KMC). Previously there has been reliance on the contracting agency to provide the dosimetry badges. The inspector stated that since KMC is the licensee, KMC is responsible for providing the dosimetry badges. In addition, the dosage for the temporary hired technologist for the year prior to working at KMC needs to be obtained and subtracted from the allowable dose for the year while they are at KMC.

Corrective Actions:

- Contracted or temporary technologists received dosimetry badges issued by KMC and dose readings prior to working at KMC were requested and/or received to monitor annual dose limits.
- The following policy was put into effect immediately after the inspection:
  - Any contracted or temporary technologist will be badged by KMC under its dosimetry program, currently through Landauer, Inc. If working in Nuclear Medicine, this will include both a ring and body badge.
  - Contracted or temporary technologists will need to provide their dosimetry records for the year in which they begin at KMC. The doses for the year prior to working at KMC will count against their annual allowable dose for the year.

All corrective actions noted above have been completed as of the date of this letter to be in full compliance with regulatory requirements to prevent reoccurrence of these violations.

If you have any questions about this response, please contact Harry Palmer M.C.E. R.S.O. at [saddhu809@gmail.com](mailto:saddhu809@gmail.com) or (808) 226-1961.

Sincerely,



Gregg Oishi  
Senior Vice President and Chief Administrative  
Officer / Chief Financial Officer

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