

**Franklin Medical Consultants  
29829 Telegraph Road, Suite A  
Southfield, MI 48034**

January 11, 2012

Ms Anne T. Boland, Director  
U.S. Nuclear Regulatory Commission  
Division of Nuclear Materials Safety  
Region III  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

Dear Ms Boland:

License No. 21-12460-01

This letter is in response to your letter of October 21, 2011 requesting additional information regarding the inspection of our office on August 26 and 27.

During the inspection it was identified that the nuclear medicine technologist failed to wear his assigned ring dosimeter while handling radioactive material as required, failed to properly record and maintain end of day surveys over a period of several months, and failed to properly record and maintain the dose calibrator constancy records over a period of several months. Prior to the inspection our consulting physicist would perform quarterly audits of the records. However the technologist would always put off the inspections for 2 to 3 days because he said he was too busy, plus he had the records on paper and that they needed to be transferred to the computer. It has since been found that he was not maintaining the records properly. With regards to him not wearing his ring dosimeter, he would normally have it on during the quarterly audits.

The following are the violations found during the NRC inspection with the corrective actions.

A. It was identified that the technologist did not wear the assigned finger exposure monitor as required. The technologist in question offered no explanation as to why he did not wear his ring dosimeter during the inspection. The policy is that the nuclear medicine technologist is required to wear the assigned finger exposure monitor when handling radioactive sources. This policy has been explained to the new technologist and compliance is being monitored by the RSO and the medical physicist to ensure compliance.

Full compliance was achieved the next work day after of the inspection, August 29, 2011.

B. It was identified that the technologist did not maintain records of (1) daily GM end of day surveys and (2) weekly removable contamination surveys. The technologist stated that he had the records on pieces of paper which had not been put into the computer as of that date. It was found that when the computer entries were made they did not always match the paper notes as to the

data and the dates. The policy is that the nuclear medicine technologist is required to perform and maintain records of (1) daily GM end of day surveys and (2) weekly removable contamination surveys. This policy has been explained to the new technologist and compliance is being monitored by the RSO and the medical physicist during random unannounced inspections to ensure compliance.

Full compliance was achieved the next work day after of the inspection, August 29, 2011.

C. . It was identified that the technologist did not maintain records of the dose calibrator constancy test. The technologist stated that he had the records on pieces of paper which had not been put into the computer as of that date. It was found that when the computer entries were made they did not always match the paper notes as to the data and the dates. The policy is that the nuclear medicine technologist is required to perform the dose calibrator constancy test each day the system is used to measure doses. This policy has been explained to the new technologist and compliance is being monitored by the RSO and the medical physicist during random unannounced inspections to ensure compliance.

Full compliance was achieved the next work day after of the inspection, August 29, 2011.

As result of the violations received and the corrective actions taken to ensure that these problems don't happen again in the future there is greater oversight of the program by the RSO who is on site several days per week. The quarterly audits by the medical physicist are not always scheduled and are therefore not always announced. The old technologist that was not following the policies and rules as required was let go, and is no longer employed at the facility. A new technologist has been hired who is doing an excellent job in maintaining the records and following the proper procedures. We believe that the current program will ensure that there will be no items of noncompliance in the future.

Sincerely,



Arthur Rose, M.D.  
Radiation Safety Officer

Addendum to inspection response letter.

Attached is a checklist that will be posted in the nuclear medicine hot lab to be used by the RSO and the medical physicist as a record of the random spot checks to be performed . Whenever either the RSO or the medical physicist perform a spot check of the items listed they will initial the appropriate box on the checklist. This will serve as a written record that the spot checks are being performed.

## RSO /Medical Physicist Audit List

Month:

Day	Badges worn	Daily survey	Weekly wipe	D.C constancy
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
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**C O V E R**  
**S H E E T**

**FAX**

To: ANNE T. BOLAND, DIRECTOR  
Fax#: 630-515-1078  
Subject: INSPECTION RESPONSE LIC-21-12460-01  
Date: 1/15/12  
Pages: 5, including this cover sheet.

COMMENTS:

*If there are any questions please call me.*

*Ray A. Carlson, MS*  
MEDICAL PHYSICIAN

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