

INSPECTION REPORT NO. 81-01

Attached

Paul S. Friedman MD
1422 Chestnut St
Phila PA 19102

- Appendix A
- Appendix B
- Appendix C
- Memo

Licensee contact: Dr Paul Friedman Telephone no. 204-2163

License no. 37-00147-02 Last amendment and date: #12 Sept 04, 1980

Category: G, and Priority: 4, as of last amendment.

Inspection date(s): 7/21/81 Type of inspection: unannounced

SUMMARY OF FINDINGS AND ACTION

- No noncompliance, clear 591 issued
- Noncompliance, Appendix A
- Action on previous noncompliance, Appendix B
- Noncompliance, 591 issued
- Regional action Hq action
- Supplemental info, Appendix C

RECOMMENDATIONS

See basis in Appendix C or attached memo.

- Change Category to: G2
- Next inspection date: 0785
- Change Priority to: 7

PERSONS CONTACTED

Dave Bryant, Chief N.M. Tech

Dr Paul Friedman (phone)

Inspector: [Signature]

Approved: [Signature]

7/27/81

7/29/81 B/S

Plan Approved: _____

Date: _____

Licensee: _____

License No: _____

Inspection Items	Scheduled for Inspection	Post-Inspection Status	Module No.	766 Time Info
Management Meeting - Entrance and Exit Interviews (Required)	✓	✓	30703B	
Program Requirements, MC 2860 (Required)	✓	✓	78710B	1
Followup on Noncompliance and Deviations	✓	✓	92702B	1/2
Independent Inspection Effort (Required)	✓	✓	92706B	1/2
Transportation			86740B	
Licensee Event Followup			92700B	
Followup on Inspector-Identified Problems			92701B	
IE Bulletin/Immediate Action Letter Followup			92703B	
Followup on Headquarters Requests			92704B	
Followup on Regional Requests			92705B	
Inspector Dispatched to Site			93700B	
Followup on Significant Event Occurring During Inspection			93701B	
Initial Management Meeting			38800B	

AREAS INSPECTED AND FINDINGS

Licensee: _____ License no: _____ Amendment no: _____

INSPECTION ITEMS	CRITERIA	FINDING
<u>1. Organization</u>	Lic Cond	<u>C</u>
Structure of organization as described in requirements?	<u>14</u>	
NOTES & REMARKS:		
<u>2. Licensee internal audits</u>	Lic Cond	<u>C</u>
Scope and frequency of audits as required? Conducted by appropriate persons? Records maintained? Reviewed by management? Deficiencies identified & corrected?	<u>14</u>	
NOTES & REMARKS:		
<u>3. Training and qualification of personnel</u>	Lic Cond	<u>C</u>
Training & retraining conducted as required? Written & oral exams conducted? Examination results reviewed by management? Instructions to workers per 19.12?	<u>14</u>	
NOTES & REMARKS:		
<u>4. Radiation protection procedures</u>	Lic Cond	<u>C</u>
Procedures available and implemented? Identify radiopharmaceutical and dose(s)? Cover handling of patients receiving therapeutic doses? Cover handling of cadavers? Emergency procedures for spills, etc? Personnel understand procedures?	<u>14</u>	
NOTES & REMARKS:		

AREAS INSPECTED AND FINDINGS

Licensee: _____ License no: _____ Amendment no: _____

INSPECTION ITEM	CRITERIA	FINDING
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5. Use of materials

Lic Cond 14

S.L. V

Procurement and use as required?
Special tests (moly breakthrough, leak tests, etc) required?

→ Dose calibration checks performed? Not performed
Posting & labeling as required? 20.203

NOTES & REMARKS:

6. Storage of materials

20.207

C

Material secured in both restricted and unrestricted areas? Adequately?

NOTES & REMARKS:

7. Facilities

Lic Cond 14

C

As described in lic cond or application?
Any changes made? Adequacy?

NOTES & REMARKS:

8. Instruments

Lic Cond 14

SL (V)

Survey meters & instruments adequate for program?

→ Instruments & meters operable? Calibrated?
Calibration adequate?

Not calib annually

NOTES & REMARKS:

→ limitedly test not conducted QTY

AREAS INSPECTED AND FINDINGS

Licensee: _____ License no: _____ Amendment no: _____

INSPECTION ITEMS	CRITERIA	FINDING
<u>9. Receipt and transfer of material</u>		<u>C</u>
Written procedures for pickup, receiving, opening packages?	20.205	
Survey of packages when received?	20.205(c)(1)	
Records of survey of packages?	20.401(b)	
Transfer of materials proper? Transfer records maintained?	30.41, 30.51	
Authorized containers used? Shipping papers & package labels proper for packages on hand?	71.5	
NOTES & REMARKS:		

10. Personnel protection - externalSLV

Personnel monitoring controls adequate? Exposures minimized?	20.101, 20.202	
Exposure records (NRC-4 or 5) maintained? Available for employee review?	20.102(b), 20.401(a)	
→ Surveys conducted? Adequate? <i>Not weekly of prog am</i>	20.201	
Records of monitoring, surveys?	20.401	
Levels in unrestricted areas within limits?	20.1, 20.105	

NOTES & REMARKS:

11. Personnel protection - internalA/a

Airborne concentrations in restricted areas?	20.103,	
Exposures to minors?	20.104	
Posting of airborne radioactivity areas?	20.203(d)	
Survey, monitoring adequate for airborne radioactivity, surface contamination? Records maintained?	20.201 20.401	

NOTES & REMARKS:

AREAS INSPECTED AND FINDINGS

Licensee: _____ License no: _____ Amendment no: _____

INSPECTION ITEM	CRITERIA	FINDING
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12. Effluent controls, waste disposal

Release of effluents controlled?	20.106, 20.303	
Waste disposals controlled?	20.301, 20.303, 20.304, 20.305	
Procedures, records maintained?	20.401, Lic Cond _____	
Surveys made? Adequate?	20.401	

NOTES & REMARKS:

13. Notifications and reports

To individuals.	19.13	
Overexposures, excessive levels & concentrations, incidents.	20.403, 20.405	
Personnel exposures and monitoring, termination reports.	20.407; 20.408	
Theft or loss of licensed material.	20.402	

NOTES & REMARKS:

14. Posting of notices

Part 20, license & documents, procedures, notice of violations posted?	19.11(a)	
NRC-3 posted?	19.11(c)	

NOTES & REMARKS:

15. Other license conditions

Lic _____

AREAS INSPECTED AND FINDINGS

Licensee: _____ License no: _____ Amendment no: _____

INSPECTION ITEMS	CRITERIA	FINDING
16. <u>Confirmatory measurements</u>	GM survey meter survey of population and adjacent area. No contrast derived.	<u>C</u>
17. <u>Independent inspection effort</u>	Accountability for therapeutic implant services Special Diagnostic Contributions Eyes Dermatology X-ray procedures	_____
18. <u>Incidents and events</u>	Any incidents of misadministrations, contamination, etc, not otherwise covered by reports?	_____

APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: _____

License no: _____

Reference	Basis for noncompliance
Report item _____ 10 CFR _____ Lic Cond <u>14</u> Type n/c <u>V</u>	Application dated 8/11/80 Item #10 A GM survey meter not calibrated annually.
Report item _____ 10 CFR _____ Lic Cond <u>14</u> Type n/c <u>V</u>	Application dated 8/11/80 Item #10 B (1) instrument not checked daily or prior to use.
Report item _____ 10 CFR _____ Lic Cond <u>14</u> Type n/c <u>V</u>	Application dated 8/11/80 Item #10 B (2) No quarterly linearity tests
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	Application dated 8/11/80 Gen Rad notes for Eff One of RAN #11 Reproduction areas not checked after each procedure
Report item _____ 10 CFR _____ Lic Cond <u>14</u> Type n/c <u>V</u>	Application dated 8/14/80 Item # 17 (2) weekly no survey which at least one study was performed.

APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: _____

License no: _____

Identification and summary of action taken Status

Report no: 79-01 Type n/c: Inf Describe: 4/10 place of use

Action taken: No delinquent to residence This one using Nuclear Pharmacy and there is no problem. OPEN
CLOSED

Report no: 79-01 Type n/c: Inf Describe: 20.2016 re 20.103

Action taken: GM meter was inoperable which they have had it fixed. OPEN
CLOSED

Report no: 79-01 Type n/c: Inf Describe: 20.2016 re 20.101

Action taken: Using ring TLD badges OPEN
CLOSED

Report no: _____ Type n/c: _____ Describe: _____

Action taken: _____ OPEN
CLOSED

Report no: _____ Type n/c: _____ Describe: _____

Action taken: _____ OPEN
CLOSED

APPENDIX C - SUPPLEMENTARY INFO _____

Licensee: _____

License no: _____

- Uncorrected/repeated noncompliance
- Unusual occurrence, conditions, etc
- Basis for change of Category or Priority

- Unresolved items
- Inspector's comments

20mti: This license was classified as a G 4 previous
 since they are only license for Group II and
 I-131 and ^{20mti} P32 they should be reclassified as a G 2 VII
 (I-131 has only been used once in the last yr and no P32 and

This is a small quantity under medical dept.

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION I

Docket No.:

License No.:

Licensee:

Inspection dates:

Inspector(s):

Scope of Inspection:

Summary of findings and proposed enforcement action:

Package inspection results:

Number of packages opened: _____ (If none, explain why)

Results: