

APPENDIX A
NOTICE OF VIOLATION

University of Puerto Rico

License No. 52-01946-07

As a result of the inspection conducted on November 18 and 20, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified.

License Condition 23 requires that licensed material be used in accordance with procedures contained in your application dated October 16, 1978. One procedure in your application requires that areas used for the preparation of radiopharmaceuticals and elution of $Mo^{99}-Tc^{99m}$ generators shall be surveyed weekly to determine radiation levels and contamination levels.

Contrary to the above, the requirement for weekly surveys to determine radiation levels and contamination levels in areas used for the preparation of radiopharmaceuticals and elution of $Mo^{99}-Tc^{99m}$ generators was not met in that records indicate surveys were performed only on 7/1/80, 7/23/80, 9/2/80, 10/8/80, 10/27/80 and 11/13/80.

This is a Severity Level V Violation (Supplement VII.E).

Pursuant to the provisions of 10 CFR 2.201, University of Puerto Rico is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violation; (2) the reasons for the violation if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date: DEC 24 1980

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