

APPENDIX A

NOTICE OF VIOLATION

Pennsylvania Endocrine Laboratory  
Philadelphia, Pennsylvania 19107

Docket No. 030-19981  
License No. 37-20611-01

As a result of the inspection conducted on August 16, 1989, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1988), the following violation was identified:

10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, from October, 1984 through March, 1988, an adequate evaluation was not made to assure compliance with 10 CFR 20.106, which limits the yearly average concentration of radioactive material in air discharged to unrestricted areas. Specifically, the licensee did not perform air sampling to determine the concentration of iodine-125 in the exhaust from a chemical fume hood where iodinations were performed every eight weeks, using up to 900 microcuries of iodine-125. The licensee based the evaluation of the concentration of iodine-125 in the hood effluent on fume hood exhaust air sampling data collected from similar iodinations he performed at a different licensed facility, which indicated concentrations of iodine-125 below applicable limits.

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

Pursuant to the provisions of 10 CFR 2.201, Pennsylvania Endocrine Laboratory is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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