



THE GRADUATE HOSPITAL

One Graduate Plaza, Philadelphia, Pa. 19146 • (215) 893-2000

September 20, 1989

Docket No. 030-31046

License No. 37-28359-01

U.S. Nuclear Regulatory Commission, Region 1
Attn: Mohamed M. Shanbaky, Chief
Nuclear Materials Safety Section A
Division of Radiation Safety and Safeguards
475 Allendale Road
King of Prussia, Pennsylvania 19406

Gentlemen:

I am writing on behalf of Graduate Hospital in response to the Notice of Violation contained in your August 22, 1989 letter addressed to Mr. Charles Ciccone, Administrator Ancillary Services.

Graduate Hospital responds to the Notice of Violation as follows:

- A. Training for ancillary personnel at the annual frequency.
 - 1. Ancillary personnel have been trained.
 - 2. Training procedures have been revised to include ancillary personnel for training and annual retraining.
 - 3. Full compliance was achieved on September 15, 1989.

- B. Surveys to limit disposal of radioactive material to the sewer system.
 - 1. The releases of radioactive material to the sewer have been evaluated to assure compliance with 10 CFR 20. 303.
 - 2. Sewer disposal limits have been established for all facilities at Graduate and personnel reinstructed concerning sewer disposals.
 - 3. Full compliance was achieved on September 15, 1989.

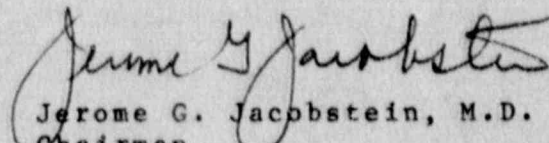
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Mohamed M. Shanbaky, Chief
Nuclear Materials Safety Section A

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September 20, 1989

I trust that the above information is satisfactory. If additional information is required please contact me.

Sincerely yours,


Jerome G. Jacobstein, M.D.
Chairman
Radiation Safety Committee

JGJ:dmj

cc: Charles Ciccone
Lisa Exton
Mark Selikson, PhD.



Suspense

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

AUG 22 1989

Docket No. 030-31046

License No. 37-28359-01

Graduate Hospital
ATTN: Charles Ciccone
Administrator Ancillary Services
One Graduate Plaza
Philadelphia, Pennsylvania 19146

Gentlemen:

Subject: Routine Inspection No. 030-31046/89-01

On July 5, 1989, JoAnn V. Stambaugh and John Pelchat of this office conducted a routine safety inspection at One Graduate Plaza, Philadelphia, Pennsylvania 19146 of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. The findings of the inspection were discussed with Mr. Ciccone at the conclusion of the inspection.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed as Appendix A and categorizes each violation by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy). You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

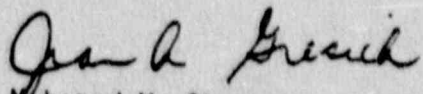
In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

~~8908310102~~ 2pp.

Your cooperation with us is appreciated.

Sincerely,

for 
Mohamed M. Shanbaky, Chief
Nuclear Materials Safety Section A
Division of Radiation Safety
and Safeguards

Enclosure:
Appendix A, Notice of Violation

cc:
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania
Jerome Jacobstein, M.D., Radiation Safety Officer

bcc:
Region I Docket Room (w/concurrences)
Management Assistant, DRMA

APPENDIX A
NOTICE OF VIOLATION

Graduate Hospital
Philadelphia, Pennsylvania 19146

Docket No. 030-31046
License No. 37-28359-01

As a result of the inspection conducted on July 5, 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 violations were identified:

- A. 10 CFR 35.21(a) requires that medical licensees appoint a Radiation Safety Officer responsible for implementing the radiation safety program. 10 CFR 35.21(b)(2) requires that the Radiation Safety Officer establish and implement written policy and procedures for training personnel who work in or frequent areas where byproduct material is used or stored.

The licensee's Radiation Safety Officer has established for these procedures those which are described in NRC Regulatory Guide 10.8, Revision 2, Appendix A, which states: ancillary personnel whose duties require them to work in the vicinity of radioactive material need to be informed about radiation hazards and appropriate precautions.

Contrary to the above, as of July 5, 1989, the Radiation Safety Officer had not implemented the required training for ancillary personnel at the annual frequency.

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

- B. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with all section 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, surveys were not made to assure compliance with 10 CFR 20.303, which limits the disposal of licensed material by release to a sanitary sewerage system. Specifically, as of July 5, 1989, Rubidium 86 was released to the sanitary sewerage system without being evaluated to ensure compliance.

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

Pursuant to the provisions of 10 CFR 2.201, Graduate Hospital 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.

~~8908310110~~ LP.