APPENDIX A

NOTICE OF VIOLATION

Abington Memorial Hospital
Abington, Pennsylvania 19001

Docket Nos. 030-00453
030-02948
License Nos. 37-00432-03
37-00432-02

As a result of the inspection conducted on June 27, 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 20.201(b) requires that each licensee make such surveys as may be necessary to comply with the regulations in 10 CFR 20 and that are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. 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 circumstances. When appropriate, such evaluation includes a physical measurement of levels of radiation and concentrations of radioactive material.

Contrary to this requirement, on March 27, 1989, surveys were not made to evaluate the extent of radiation hazards that may have been present. Specifically, no surveys (evaluations, including air monitoring or thyroid monitoring where applicable) were made during the administration of 156 millicuries of iodine-131 on March 27, 1989.

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

B. Condition 16 of License No. 37-00432-02 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated May 17, 1979 and the letter dated July 2, 1985.

1. Item No. 17 of this application requires that daily radiation protection surveys be performed in the Injection Room (exam room) and the Hot Lab.

Contrary to the above, on May 6, 13, 20, 27 and June 11, 17, 18, 25, 1989, daily radiation protection surveys were not performed in the hot lab and in the injection room.

2. Item No. 3 of the letter dated July 2, 1985, requires that all the radiation survey meters be calibrated once a year.

   Contrary to the above, as of June 27, 1989, the Keithley 36100 ion chamber had not been calibrated since January 30, 1988.

   These are Severity Level IV violations. (Supplement VI)

C. 10 CFR 30.36(b) requires, in part, that each licensee notify the NRC immediately, in writing and request termination of the license when the licensee decides to terminate all activities involving materials authorized under the license.

   Contrary to the above, on November 24, 1987, all activities authorized by NRC License No. 37-00432-03 were terminated and licensed radioactive materials were disposed of without notifying the NRC in writing.

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

D. 10 CFR 35.33(c) requires, in part, that the licensee shall notify the NRC Region I Office in writing within 15 days when a misadministration involves a diagnostic procedure administering byproduct material such that the patient is likely to receive an organ dose greater than 2 rem.

   Contrary to the above, as of June 27, 1989, the NRC Region I Office had not been notified in writing about a misadministration involving a diagnostic procedure using byproduct material such that the patient received an organ dose greater than 2 rem. Specifically, on September 16, 1988, a patient received approximately 21 millicuries of technetium-99m pertechnetate instead of 20 millicuries of technetium-99m methylene diphosphorate (MDP), which resulted in a dose of approximately 2.6 rems to the patient's thyroid.

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

Pursuant to the provisions of 10 CFR 2.201, Abington Memorial 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.