

OCT 17 1989

Docket No. 030-01902

License No. 20-08551-01

Veterans Administration Medical Center  
ATTN: Donald E. Tow, M.D.  
Chairman, Radiation Safety Committee  
1400 VFW Parkway  
West Roxbury, Massachusetts 02132

Gentlemen:

Subject: Routine Inspection No. 030-01902/89-001

On June 28, 1989, R. B. Provencher and John T. Jensen of this office conducted a routine safety inspection at the above address and at the Brockton, Massachusetts facility 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. In addition, our inspection examined the activities covered in your correspondence dated May 3, 1988. The findings of the inspection were discussed with you and Charles C. S. Ahn, Radiation Safety Officer 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 addition to the violations included in Appendix A, the inspectors observed other violations of NRC regulations and license requirements: a) the RSO failed to sign dose calibrator quality assurance check records (i.e., linearity test, accuracy test, etc.); b) labels on empty radioactive material packages were not completely obliterated prior to disposal; c) records of disposals of radioactive material held for decay did not contain the date of disposal. As indicated in the NRC Enforcement Policy, when deciding whether a Notice of Violation is needed, consideration can be given to violations of minor safety significance which are licensee identified and corrected or for which the licensee has planned prompt and effective corrective action during the inspection. After careful consideration of the criteria listed in the enforcement policy and your planned corrective actions for these violations, we have decided not to include these violations in the enclosed Notice of Violation. Similar violations of this type in the future may result in additional enforcement action.

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During the inspection, the inspectors expressed concern regarding the apparent lack of oversight of the radiation safety program by the RSO as demonstrated by the number of violations identified. In addition, the RSO failed to determine the causes which led to the increased extremity exposure of a Nuclear Medicine technologist at the West Roxbury, Massachusetts facility, during 1988. The technologists' increased frequency of handling radioactive material and the use of a "non-conventional" syringe shield for 1 cubic centimeter syringes apparently led to the relatively high monthly extremity exposures. In your response to this letter, please describe the actions you will take to assure that the RSO will provide appropriate oversight to the radiation safety program to prevent recurrence of these programmatic deficiencies.

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.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:  
Josephine M. Piccone, Ph.D.

*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 Massachusetts  
Charles Ahn, M.D., Radiation Safety Officer

Veterans Administration Central Office  
ATTN: James W. Fletcher, M.D.  
Nuclear Medicine Service (115)  
810 Vermont Avenue, N.W.  
Washington, D.C. 20420

Veterans Administration Medical Center 3

bcc:  
Region I Docket Room (w/concurrences)  
Management Assistant, DRMA  
J. Jensen, RI

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Provencher/bc  
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