

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION I

631 PARK AVENUE KING OF PRUSSIA, PENNSYLVANIA 19406

JUN 0 6 1980

Docket Nos. 30-1245 30-112 70-2390

St. Francis Hospital & Medical Center
ATTN: Sister Francis Marie
Administrator
114 Woodland Street
Hartford, Connecticut 06105

Gentlemen:

Subject: Inspection Nos. 30-1246/80-01, 30-112/80-01 and 70-2390/80-01

This refers to the inspection conducted by Miss J. McGinness and Mr. J. Nicolosi of this office on March 26 and 27, 1980, of activities authorized by NRC License Nos. 06-00854-03, 06-00854-08 and SNM-1674 and to the discussions of our findings held by Miss McGinness and Mr. Nicolosi with Dr. Marolt and Mr. Penkhus of your staff at the conclusion of the inspection. This also refers to the meeting held at your office on April 16, 1980 and attended by Mr. H. W. Crocker, Acting Chief Material Radiological Protection Section, Dr. J. E. Glenn, and Miss J. A. McGinness of my staff and by Mr. Penkhus, Dr. Marolt, and Dr. Slavin of your staff.

The inspection was an examination of activities conducted under your licenses as they relace to radiation safety and to compliance with the Commission's rules and regulations and the conditions of your licenses. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector.

Our inspector also verified the steps you have taken to correct the items of noncompliance brought to your attention in a letter dated June 30, 1978. We have no further questions regarding your action at this time.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These items of noncompliance have been categorized into the levels as described in our correspondence to you dated December 31, 1974. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. During the meeting at your office on April 16,

1980, Mr. Crocker expressed our concern about the need for an effective management audit system to avoid future items of noncompliance. From the discussions during the meeting, we understand that you will initiate changes to improve the effectiveness of your management control systems and have taken steps to bring your licensed program into compliance with NRC requirements. In your reply to this letter, please confirm these understandings and describe any other actions taken or planned to improve your radiation safety program.

As was explained during the meeting on April 16, 1980 the number and nature of the apparent items of noncompliance identified during this inspection have caused this office to consider the implementation of escalated enforcement action available to the Commission. As outlined in the "Criteria for Determining Enforcement Action" contained in our letter to all licensees dated December 31, 1974, enforcement actions available to the Commission include administrative actions in the form of written Notice of Violation, imposition of Civil Monetary Penalties, and Orders pertaining to the Modification, Suspension, or Revocation of a License. After careful consideration of the items of noncompliance identified in Appendix A to this letter and in light of the corrective actions described by you during the meeting at your office on April 16, 1980, we do not propose that escalated enforcement action be taken by NRC in this case, although under other circumstances a civil penalty would have been considered the appropriate enforcement sanction. However, due to the number and nature of the items of noncompliance, we plan to give special attention to our evaluation of your reply to this letter and to conduct unannounced inspections of your licensed activities at an increased frequency in the future. The results of these inspections will be considered in determining whether we will take any further enforcement action in the form of imposition of monetary civil penalties, or modification, suspension or revocation of your license.

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.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Boyce H. Grier

Director

Enclosure:
Appendix A, Notice of Violation