



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

AUG 26 1980

70-1349

HOSPITAL PAVIA
APARTADO 11137
SANTURCE
NRC LIC. #1 SNM-1372

PR 00910

Gentlemen:

The enclosed IE Circular 80-19 is forwarded for your information. If there are any questions related to the suggested actions, please contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "James P. O'Reilly".

James P. O'Reilly
Director

Enclosures:

1. IE Circular No. 80-19
2. List of Recently Issued
IE Circulars

8009260 274

DUPLICATE

SSINS No.: 6830
Accession No.:
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IEC 80-19

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D.C. 20555

August 26, 1980

IE Circular No. 80-19: NONCOMPLIANCE WITH LICENSE REQUIREMENTS FOR MEDICAL
LICENSEES

Description of Circumstances:

The NRC inspection program is uncovering many items of noncompliance at medical facilities indicating that employees are not familiar with the requirements that are conditions for issuance of the license. The major causes include the following:

- (1) The application for licenses is often prepared by an outside consultant with no one at the facility being thoroughly familiar with the license conditions or other details of the license application.
- (2) Employees of medical facilities do not realize that many commitments made in the license application actually become part of the license by reference in a stated license condition. The applications and supporting letters incorporated as requirements are identified by date in this condition to the license. This is known as a "tie-down" condition. That is, the license is issued by the NRC under the conditions stated therein, and compliance with all of those conditions is required. An important example of the "tie-down" condition includes the operating and radiological safety procedures submitted with the application. The license is issued under the condition that the procedures tendered with the application will be used and followed.
- (3) Employees of medical facilities are not being instructed in the applicable provisions of Commission regulations and licenses for protection of personnel from exposures to radiation or radioactive materials in accordance with Section 19.12 of Part 19, Title 10, Code of Federal Regulations.

Notice to Licensees:

Both management and involved employees of medical facilities must be aware of and comply with all license conditions. The following actions are recommended:

- (1) Assure that a representative of management understands the commitments being made in the applications and contained in the license as finally issued.
- (2) Assure that existing and new employees are instructed in and are familiar with all applicable conditions of the license, including the details of applicable documents, such as procedures that are incorporated by condition into the license.

- (3) Assure that all employees are instructed in application changes each time the license is amended.
- (4) Assure that copies of the NRC regulations and copies of the license, as well as documents incorporated into the license by reference, are posted and/or are made available to employees in accordance with Section 19.11 of Part 19, Title 10, Code of Federal Regulations.

No written response to this Circular is required. If you require additional information regarding this subject, please contact this office.

RECENTLY ISSUED
IE CIRCULARS

Circular No.	Subject	Date of Issue	Issued to
80-19	Noncompliance With License Requirements for Medical Licensees	8/26/80	All Medical Licensees
80-18	10 CFR 50.59 Safety Evaluations for Changes to Radioactive Waste Treatment Systems	8/22/80	All power reactor facilities with an OL or CP
80-17	Fuel Pin Damage Due to Water Jet from Baffle Plate Corner	7/23/80	All holders of PWR OLs and PWR CPs
80-16	Operational Deficiencies In Rosemount Model 510DU Trip Units And Model 1152 Pressure Transmitters	6/27/80	All power reactor facilities with an OL or a CP
80-15	Loss of Reactor Coolant Pump Cooling and Natural Circulation Cooldown	6/20/80	All power reactor facilities with an OL or CP
80-14	Radioactive Contamination of Plant Demineralized Water System and Resultant Internal Contamination of Personnel	6/24/80	All holders of power and research reactor licenses (operating and construction permits), and fuel cycle licensees
80-13	Grid Strap Damage in Westinghouse Fuel Assemblies	5/18/80	All holders of reactor OLs and CPs
80-12	Valve-Shaft-To-Actuator Key May Fall Out of Place When Mounted Below Horizontal Axis	5/14/80	All holders of reactor OLs and CPs
80-11	Emergency Diesel Generator Lube Oil Cooler Failures	5/13/80	All holders of a power reactor OL or CP
80-10	Failure to Maintain Environmental Qualification of Equipment	4/29/80	All holders of reactor OLs and CPs
80-09	Problems With Plant Internal Communications Systems	4/28/80	All holders of a power reactor OL or CP
80-08	BWR Technical Specification Inconsistency - RPS Response Time	4/18/80	All General Electric BWRs holding a power reactor OL