

APPENDIX

NOTICE OF VIOLATION

Department of the Air Force
Brooks AFB, TX 78235-5000

Docket: 030-28641/89-08
Permit No: 08-08401-1AFP

As a result of the inspection conducted on September 21, 1989, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the following violations were identified:

- A. 10 CFR 35.70(a) requires that licensees survey with a radiation detection survey instrument at the end of each day of use all areas where radiopharmaceuticals are routinely prepared for use or administered.

Contrary to the above, as of September 21, 1989, surveys with a radiation detection instrument were not performed on weekends in areas where radiopharmaceuticals were routinely prepared for use or administered, and radiopharmaceuticals were prepared and administered during these times.

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

- B. 10 CFR 35.92(a)(1) requires that byproduct material held for decay-in-storage before disposal in ordinary trash be held a minimum of ten half-lives.

Contrary to the above, as of September 21, 1989, byproduct material held for decay-in-storage was routinely sent for disposal in ordinary trash before the required ten half-lives. Specifically, iodine-131 waste from radiopharmaceutical therapy patients was not held for the required ten half-lives.

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

Pursuant to the provisions of 10 CFR 2.201, the Department of the Air Force is hereby required to submit to this office, within 30 days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 17th day of November 1989

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