APPENDIX A

NOTICE OF VIOLATION

Our Lady of Lourdes Hospital
Camden, New Jersey 08103
License Nos. 29-06431-01 Docket No. 30-2488

As a result of the inspection conducted on January 20, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

A. 10 CFR 20.201(b) requires that you make such surveys as may be necessary for you to comply with all sections of Part 20. 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 conditions.

1. Contrary to this requirement, as of January 20, 1981, you failed to make such surveys as were necessary to assure compliance with 10 CFR 20.101, "Radiation dose standards for individuals in restricted areas," a regulation that limits the radiation exposure to the extremities of individuals. Specifically, you failed to evaluate the radiation doses to the hands and fingers of certain individuals for specific periods of time in 1980 during which licensed material was handled and TLD ring badges were assigned, worn, and your processor indicated the badges were either contaminated or damaged and could not be read.

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

2. Contrary to this requirement, you failed to make such surveys as were necessary to assure compliance with 10 CFR 20.301, a regulation that describes authorized means of disposing of licensed material contained in waste. Specifically, on the day of the inspection, January 20, 1981, you failed to survey for residual amounts of radioactive materials in disposable vials containing measureable amounts of licensed materials prior to disposing of the material in the normal trash.

   This is a Severity Level V Violation (Supplement IV).

B. Condition 18 of your license requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in your application dated August 2, 1978.

1. Item 15, Rule 7 of this application requires that personnel monitoring devices (film badge, TLD) be worn at all times.

Contrary to this requirement, on the day of the inspection, January 20, 1981, one of your technicians was not wearing the required monitoring devices while handling radioactive materials.

This is a Severity Level IV Violation (Supplement VII).

2. Item 10.C of this application, under "Methods for Calibration of Dose Calibrator" requires that daily, or before each use of the instrument, the dose calibrator be checked for constancy.

   Contrary to this requirement, on the day of the inspection, January 20, 1981, and for twelve other dates in 1980 this required check was not performed.

   This is a Severity Level V Violation (Supplement VII).

3. Item 10.A under "Methods for Calibration of Dose Calibrator," of this application dated August 2, 1978 requires a quarterly test for instrument linearity.

   Contrary to this requirement, on the day of the inspection, January 20, 1981, records indicated linearity tests were performed for the first and third quarter of 1980 and second and third quarter in 1979 rather than for each calendar quarter, as required.

   This is a Severity Level V Violation (Supplement VII).

C. 10 CFR 35.14(e) requires that sealed calibration or reference sources possessed pursuant to 10 CFR 35.14(d) be tested for leakage and/or contamination at intervals not to exceed six months.

   Contrary to this requirement, as of the day of the inspection, January 20, 1981, you have failed to leak test your 206 microcurie sealed cesium-137 reference source which you received in 1978, an interval of more than six months.

   This is a Severity Level V Violation (Supplement VII).

Pursuant to the provisions of 10 CFR 2.201, Our Lady of Lourdes Hospital is hereby required to submit to this office within twenty-five days of the date of 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. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated 5 FEB 1981

John D. Kinneman, Chief
Materials Radiological Protection
Section