APPENDIX A

NOTICE OF VIOLATION

Worcester Hahnemann Hospital
Worcester, Massachusetts 01605
License No. 20-15761-01

Docket No. 30-9736

As a result of the inspection conducted on January 30, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

A. 10 CFR 20.207(a) requires that licensed materials stored in an unrestricted area be secured against unauthorized removal from the place of storage. 10 CFR 20.207(b) requires that materials not in storage be under constant surveillance and immediate control of the licensee. As defined in 10 CFR 20.3(a)(17) an unrestricted area is any area access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

Contrary to this requirement, as of the day of the inspection, January 30, 1981, you have stored iodine-131 capsules in your Pathology Department, an unlocked, unrestricted area. This storage area was accessible to unauthorized individuals and the licensed material was not under constant surveillance or your immediate control.

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

B. License Condition 16 requires that licensed material be possessed and used in accordance with the statements, representations and procedures contained in your license application dated September 1, 1978 and in a letter dated October 24, 1979.

1. Item 10A of your application requires that your dose calibrator be tested for linearity at installation and quarterly.

Contrary to this requirement, as of the day of the inspection, January 30, 1981, your dose calibrator was not tested for linearity between July 11, 1980 and December 10, 1980, a period of more than 3 months.

2. Item 14 of your application lists the procedures required for opening packages containing radioactive materials.

Contrary to this requirement, as of the day of the inspection, January 30, 1981, these procedures were not implemented when opening packages containing therapeutic doses of iodine-131.

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3. Item 17 of your application requires that a series of wipe tests be performed weekly in certain areas to measure contamination levels. One of these areas is your scanning room.

Contrary to this requirement, as of the day of the inspection, January 30, 1981, wipe tests were not performed weekly in your scanning room.

These are Severity Level V Violations (Supplement VII).

C. 10 CFR 19.11(a) and (b) require that current copies of Part 19, Part 20, your license, license conditions, documents incorporated into the license, license amendments and operating procedures be posted, or that a notice describing these documents and where they may be examined, be posted.

Contrary to this requirement, as of the day of the inspection, January 30, 1981, neither the documents nor the notice were posted.

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

Pursuant to the provisions of 10 CFR 2.201, Worcester Hahnemann 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 21 MAY 1981

Boyce H. Grier
Director