

APPENDIX A

NOTICE OF VIOLATION

St. Joseph's Hospital and Medical Center  
Paterson, New Jersey 07503

Docket Nos. 30-00366  
30-02526  
License Nos. 29-10191-01  
29-10191-02

As a result of the inspection conducted on February 5 and 6, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. Condition 6 of License No. 29-10191-02 limits the possession of byproduct material to those radionuclides named.

Contrary to this requirement, as of the days of inspection, February 5 and 6, 1981, you possessed since 1973 americium-241 (activity unknown) as a sealed source (serial #333837-10), a radionuclide for which you are not authorized.

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

- B. Condition 18 of License No. 29-10191-02 requires that you possess and use licensed material in accordance with the statements, representations and procedures contained in your application dated December 17, 1979.

Item 15 of this application requires that you follow the "Laboratory Rules for the Use of Radioactive Material" contained in Appendix G of Regulatory Guide 10.8.

1. Item 12 of Appendix G requires that radioactive solutions be confined in covered (lead) containers plainly identified and labeled with the name of the compound, radionuclide, date and activity.

Contrary to this requirement, as of the days of inspection, February 5 and 6, 1981, you have failed to properly identify licensed material in your hot laboratory. Specifically, a lead container marked as containing technetium-99m as "sodium pertechnetate" was observed to actually contain technetium-99m as "technetium sulfur colloid."

2. Item 3 of Appendix G requires that personnel monitor (survey) their hands for contamination after handling isotopes.

Contrary to this requirement, on the dates of the inspection, February 5 and 6, 1981, personnel in your nuclear medicine laboratory failed to adequately monitor their hands after handling isotopes.

This item was identified through independent measurements by our inspector which indicated that your personnel had detectable contamination on their hands of which they were unaware.

3. Item 11 of Appendix G requires that you survey generator, kit preparation and injection areas for contamination after each procedure or at the end of the day.

Contrary to this requirement, as of the days of inspection, February 5 and 6, 1981, you have failed to routinely monitor the injection area in your nuclear cardiology laboratory after each procedure or at the end of the day.

4. Item 8 of Appendix G requires that personnel wear TLD finger badges during elution of generators and preparation, assay, and injection of radiopharmaceuticals.

Contrary to this requirement prior to November, 1980 you permitted a student technologist to prepare and assay radiopharmaceuticals without wearing the required TLD finger badge.

These are Severity Level IV Violations (Supplement VI).

- C. 10 CFR 20.102(a) requires that, for individuals first entering your restricted area, you determine the occupational dose received at other facilities in the current calendar quarter.

Contrary to this requirement, you have permitted students in your nuclear medicine technology training program to rotate through your institution from other medical facilities and work in your restricted areas without requiring them to submit their prior exposure history.

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

- D. 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.

Contrary to this requirement, as of the day of the inspection, February 5, 1981, you failed to perform such surveys (evaluations) as were necessary to assure compliance with 10 CFR 20.101, "Radiation dose standards for individuals in restricted areas." Specifically, you failed to evaluate the dose to the whole body of a volunteer who worked in your teletherapy unit without a film badge.

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

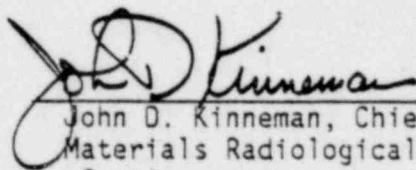
- E. 10 CFR 35.21(d) requires, for teletherapy units, that the exposure rate or dose rate values determined by full calibration measurements be corrected mathematically for physical decay for intervals not exceeding one month.

Contrary to this requirement, the dose rate values used for treatment on the days of the inspection, February 5 and 6, 1981, had been corrected mathematically for a three month interval.

This is a Severity Level V Violation (Supplement VII)

Pursuant to the provisions of 10 CFR 2.201, St. Joseph's Hospital and Medical Center 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 14 APR 1981

  
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John D. Kinneman, Chief  
Materials Radiological Protection  
Section



**St Joseph's Hospital and Medical Center**  
703 Main Street • Paterson • New Jersey 07503 • (201) 684-7500

Continuing Commitment to Care

March 24, 1981

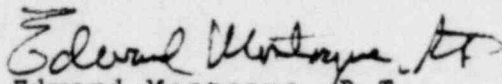
U.S. N.R.C.  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Nicolosi:

The attached is all the paperwork we have relating to our LFOU Elscint gamma camera. The last page is the receiving report.

If I can be of any further assistance, please feel free to call me.

Sincerely yours,

  
Edward Montague, R.T.  
Technical Director

EM: ri  
Attchmt.

**ST. JOSEPH'S HOSPITAL AND MEDICAL CENTER**

Req 8/29/78

703 Main Street  
Paterson, N. J. 07503

**PURCHASE ORDER**

ORDER **K 71573**

DATE **8/30/78**

OUR ORDER NUMBER MUST APPEAR  
ON YOUR INVOICE, PACKING LIST LABELS  
AND CORRESPONDENCE  
DO NOT INCLUDE ITEMS COVERED BY  
MORE THAN ONE ORDER ON ANY INVOICE

TO **Elscint Inc.**  
**138-160 Johnson Ave.**  
**Hackensack, N.J. 07602**

DELIVER NOT LATER THAN **30-45 days ARO** SHIP VIA **Del.**

F.O.B. **Dest.** TERMS

COST CENTER	EXP. ACCT.	G/L AC	QUANTITY	ARTICLE AND DESCRIPTION	UNIT PRICE	AMOUNT
439		1115	1 only	<p>Dymac L.F. large field camera w/accessories Per your quote #011503 copy attached.</p> <p><i>9/20/78 #32980</i></p> <p>Unit must meet all Hospital safety standards and OSHA requirements.</p> <p>Subject to approval by Hospital Electrical Safety Committee.</p> <p>Must have approved Hospital 3-wire cord and plug.</p> <p>Must be UL-approved.</p> <p>FURNISH: 2-copies each, Operators and Users manual Maintenance and testing procedures Circuit diagram and functional description of circuits.</p> <p>All guarantees and warranties.</p> <p>For: Nuclear Medicine</p>		\$95,000.00

MARK FOR NUCLEAR MEDICINE.

PLEASE SHIP ATTENTION: RECEIVING DEPT. HOURS 8 A.M. to 4 P.M. MON. thru FRIDAY

ST. JOSEPH'S HOSPITAL IS REGISTERED TO MAKE TAX FREE PURCHASES UNDER TREASURY DECISION A 142572 N.J. SALES TAX EXEMPTION #EO-221-487-602 PRICES AS LAST, UNLESS OTHERWISE INDICATED

ST. JOSEPH'S HOSPITAL AND MEDICAL CENTER

PER \_\_\_\_\_

**R.E. Costello**  
Director of Purchasing





**RECEIVING REPORT**  
**ST. JOSEPH'S HOSPITAL AND MEDICAL CENTER**  
 703 MAIN STREET • PATERSON, N. J. 07503

32980

VENDOR: **Elscint**

PACKING SLIP  NO PACK SLIP

DELIVERED BY: **Truck**

DATE RECEIVED

**9 / 20 / 78**

PURCHASE ORDER NO. <b>K-71576</b>	<input type="checkbox"/> PARTIAL <input checked="" type="checkbox"/> COMPLETE	<input type="checkbox"/> CASES	<input type="checkbox"/> CARTONS	<input type="checkbox"/> PACKAGES	<input type="checkbox"/> ROLLS	<input type="checkbox"/> BLANKET ORDER
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QUANTITY	ARTICLE AND DESCRIPTION	COMMENTS
<del>1 only</del>		
<b>1 only</b>	<b>Dymac L.F. large field camera w/assy.</b>	
<b>1 only</b>	<b>Collimator s/n 3888331-13</b>	
<b>1 only</b>	<b>Matrix s/n 40122</b>	
	<b>ORDER COMPLETE PER TOM PUZO.</b>	<b>RECEIVED BY TOM PUZO</b>
		<b>SEP 21 1978</b>

**POOR ORIGINAL**

**T. PUZO**  
RECEIVED BY

SIGNED BY

**9 / 21 / 78**  
DATE

PURCHASING