

Appendix A

NOTICE OF VIOLATION

Lake of the Ozarks General Hospital

License No. 24-18678-01

As a result of the inspection conducted on April 28, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. License Condition No. 16 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in applications dated February 27, 1979, and February 4, 1981; letter dated May 9, 1979; and letter (with attachment) received March 9, 1981.

The license application dated February 27, 1979, states that the duties described in Appendix B of the NRC licensing guide shall be followed.

Appendix B requires that the Medical Isotopes Committee shall meet as often as necessary to conduct its business but not less than once in each calendar quarter.

Contrary to this requirement, it was learned through statements of licensee representatives and a review of records that Medical Isotopes Committee meetings were held on August 23, 1979, and August 22, 1980, a period greater than quarterly.

This is a Severity Level \checkmark violation (Supplement VII).

2. License Condition No. 16 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in applications dated February 27, 1979, and February 4, 1981; letter dated May 9, 1979; and letter (with attachment) received March 9, 1981.

The license application dated February 27, 1979, states that the procedures described in Appendix I of the NRC licensing guide shall be followed for performing area surveys.

Appendix I requires daily G-M surveys of all elution, preparation, and injection areas. Weekly G-M and wipe tests of the waste storage areas shall be performed. The method used to analyze wipe tests must be capable of detecting 100 dpm/100 cm².

Contrary to these requirements, it was learned through statements of licensee representatives that daily G-M surveys of all elution, preparation, and injection areas were not performed since the date of license issuance. Weekly G-M and wipe tests of the waste storage areas were not performed since the date of license issuance. The method used to analyze wipe tests was not capable of detecting 100 dpm/100 cm². Specifically, a G-M survey meter was used to analyze wipe tests from May 23, 1980, to April 24, 1981.

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

3. License Condition No. 16 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in applications dated February 27, 1979, and February 4, 1981; letter dated May 9, 1979; and letter (with attachment) received March 9, 1981.

The license application dated February 27, 1979, states that the procedures described in Appendix D, Section 2 of the NRC licensing guide shall be followed for calibration of the dose calibrator.

Appendix D, Section 2 requires daily constancy checks to be performed on all the commonly used radionuclide settings. Linearity checks of the dose calibrator shall be performed quarterly. A geometrical variation check of the dose calibrator shall be performed at installation.

Contrary to these requirements, daily constancy checks of all commonly used radionuclide settings were not performed since April 9, 1979. Quarterly linearity checks of the dose calibrator were not performed before February 23, 1981. A geometrical variation check has not been performed since the date of license issuance.

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

4. License Condition No. 16 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in applications dated February 27, 1979, and February 4, 1981; letter dated May 9, 1979; and letter (with attachment) received March 9, 1981.

The license application dated February 27, 1979, states that the procedures described in Appendix D, Section 1 of the NRC licensing guide shall be followed for calibration of the G-M survey meter.

Appendix D, Section 1 requires that the G-M survey meter be calibrated at least annually and following repair.

Contrary to this requirement, it was learned through statements of licensee representatives that the Eberline G-M survey meter, E-530, serial 950, was last calibrated on March 31, 1980.

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

5. The following items are record keeping deficiencies.
- a. License Condition No. 15E(2) requires that records shall be maintained of the training given to personnel performing molybdenum-99 breakthrough tests.
 - b. 10 CFR Section 20.401(a) requires each licensee to maintain film badge records on Form NRC-5 or a record containing all information required in Form NRC-5.

Contrary to these requirements:

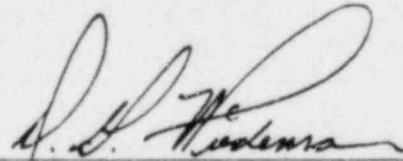
- a. Records of training given to personnel performing molybdenum-99 breakthrough tests were not maintained.
- b. Film badge records were not maintained for July and August 1979.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within twenty-five days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; 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.

5-19-81

Dated



D. G. Wiedeman, Acting Chief
Materials Radiation Protection
Section 1