

NOTICE OF VIOLATION

Lutheran Medical Center
St. Louis, MO 63318

License No. 24-04010-01
License No. 24-04010-02

As a result of the inspection conducted on December 19, 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:

License No. 24-04010-01 (Nuclear Medicine)

1. 10 CFR 35.205(e) requires a licensee to check the operation of reusable collection systems each month, and measure the ventilation rates available in areas of radioactive gas use each six months.

Contrary to the above, the licensee failed to measure the ventilation rates available in areas of radioactive gas use each six months. Specifically, ventilation rates were not measured in areas of radioactive gas use between approximately December, 1988 and November, 1989.

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

2. 10 CFR 35.50(b)(3) requires a licensee to test each dose calibrator for linearity upon installation and at least quarterly thereafter over the range of its use between the highest dosage that will be administered to a patient and 10 microcuries.

Contrary to the above, the licensee failed to test the dose calibrator for linearity over the range of its use between the highest dosage that will be administered to a patient and 10 microcuries. Specifically, for linearity tests taken on February 17, 1989 and September 28, 1989, the licensee did not complete linearity tests to 10 microcuries.

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

3. 10 CFR 35.70(h) requires that the removable contamination rates in each area be expressed in disintegrations per minute per 100 square centimeters.

Contrary to the above, since January, 1989, removable contamination rates in each area have not been expressed in disintegrations per minute per 100 square centimeters.

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

License No. 24-04010-02 (Teletherapy)

4. 10 CFR 35.610(2)(b) requires that a licensee shall provide instruction to all individuals who operate a teletherapy unit to include the procedure to be followed to ensure that only the patient is in the room before turning the primary beam of radiation on, the procedures to be followed

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if the operator is unable to turn the primary beam of radiation off, and shall provide the names and telephone numbers of the authorized users and the Radiation Safety Officer to be contacted if the teletherapy unit or console operates abnormally.

10 CFR 35.610(c) requires that a licensee shall retain for three years a record of individuals receiving instruction required by Paragraph (b) of this section, a description of the instruction, and the name of the individual who gave the instruction.

Contrary to the above, records of individuals receiving instruction required by Paragraph (b) of this section were not retained. Specifically, records of individuals receiving instruction for the period prior to September 19, 1989 were not retained.

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

5. 10 CFR 35.634(a)(3) requires that the coincidence of the radiation field and the field indicated by the light beam localizing device be performed on the teletherapy unit once each calendar month.

10 CFR 35.634(f) requires that a licensee shall retain a record of each spot-check required by Paragraph (a) of this section to include a determination of the coincidence of the radiation field and the field indicated by the light beam localizing device.

Contrary to the above, since October 26, 1987, records of the determination of the coincidence of the radiation field and the field indicated by the light beam localizing device were not retained.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) the corrective steps that have been taken and the results achieved; (2) the corrective steps that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated

January 4, 1990

Roy S. Caniano, Chief
Nuclear Materials Safety
Section 2