

Appendix A

NOTICE OF VIOLATION

Carmi Township Hospital

License No. 12-17074-01

As a result of the inspection conducted on June 24, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. License Condition No. 14 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in application dated May 14, 1976, and letters dated August 3, 1976, August 20, 1976, and July 7, 1978.

The letter dated July 7, 1978, states that all elution, preparation and injection areas shall be surveyed daily using a G-M survey meter. Weekly G-M surveys and wipe tests shall include the storage areas. The method used to analyze wipe tests shall be capable of detecting 100 dpm.

Contrary to these requirements, daily G-M surveys of the elution, preparation, and injection areas were not performed since the date of license issuance. Weekly G-M surveys and wipe tests of the generator storage area were not performed since the date of license issuance. The method used to analyze wipe tests was not sufficiently sensitive to detect 100 dpm. Specifically, wipe tests have been analyzed using a portable G-M meter which is incapable of detecting contamination levels as low as 100 dpm.

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

2. 10 CFR 35.14(e)(1)(i) states that sealed calibration or reference sources shall be tested for leakage and/or contamination at intervals not to exceed six months.

Contrary to this requirement, your nominal 212 microcurie cesium-137 calibration source has not been tested for leakage since the date of license issuance.

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

3. 10 CFR 20.401(b) requires that you maintain records showing the results of surveys that you made to assure compliance with 10 CFR 20.201(b) "Surveys."

Contrary to the above, you failed to maintain records of results of 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, the Nuclear Medicine Department failed to maintain records of surveys of radioactive waste to assure that no measurable radiation above background was present prior to disposal as normal trash since December 19, 1979.

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

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 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. Consideration may be given to extending your response time for good cause shown.

Dated

7/8/87

for William J. Adon
D. G. Wiedeman, Acting Chief
Materials Radiation Protection
Section 1