

APPENDIX A

NOTICE OF VIOLATION

Veterans Administration Hospital  
4435 Beacon Avenue South  
Seattle, Washington 98108

License No. 46-00990-01

As a result of the Washington state inspection on June 2, 1981, and in accordance with the NRC Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 49 CFR 173.392(c)(1) states that materials must be packaged in strong, tight packages so that there will be no leakage of radioactive material under conditions normally incident to transportation.

Contrary to this requirement, drum number 5, identified on RSR, No. 09019, dated June 1, 1981, (see Attachment A) was leaking liquid when received at the burial site. Loose radioactive contamination detected by a wipe of the drum ranged from 150-200 cpm (beta-gamma) above background.

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

- B. 49 CFR 173.392(c)(8) states that the outside package must be stencilled or otherwise marked "Radioactive-LSA".

Contrary to this requirement, drum number 3, identified on RSR, No. 09019, dated June 1, 1981, (see Attachment A) was not marked as "Radioactive-LSA".

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

Pursuant to the provisions of 10 CFR 2.201, the Veterans Administration Hospital, Seattle, Washington is hereby required to submit to this office within thirty days of the date of this notice, in 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 items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Original signed by  
R. D. Thomas

JUL 17 1981

Dated

R. D. Thomas, Chief  
Materials Radiation Protection Section

8108050325 810717  
NMS LIC30  
46-00990-01 PDR

**RADIOACTIVE WASTE SHIPMENT & DISPOSAL FORM**  
**US ECOLOGY, INC.**  
 EXECUTIVE OFFICE: (502) 425-7160  
 P.O. BOX 7246 • LOUISVILLE, KENTUCKY 40207  
 Illinois Office: (815) 454-2376

TO: VA HOSPITAL  
 ADDRESS: 2345 BEACON AVE  
 CITY: SEATTLE STATE: WA  
 PHONE: 762-1010  
 DATE SHIPPED: 6-1-81 SHIPMENT NO: 81-6-1  
 DRIVER: RALPH H. BARTZ PS INC  
 BILL TO: BULL TO

Permit Number: 5025  
 P. O. Box 578  
 Beatty, NV 89003  
 (702) 553-2203

Permit Number: XP. O. Box 638  
 Richland, WA 99352  
 (509) 377-2411

NO: 09019 PAGE: 1 OF 7

UN2911	UN2918	UN2912	NA9181	UN2910	NA9182
Waste Radioactive Device, N.O.S. -- Radioactive Material	Waste Radioactive Material, Fissile, N.O.S. -- Radioactive Material	Waste Radioactive Material, Low Specific Activity, N.O.S. -- Radioactive Material	Waste Radioactive Material, N.O.S. -- Radioactive Material	Waste Radioactive Material, Limited Quantity, N.O.S. -- Radioactive Material	Waste Radioactive Material, Special Form, N.O.S. -- Radioactive Material
52.5 CF				990	

P.P.G. = PLASTIC PAPER & GLASS

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	
Container No.	Content	Weight (lbs)	Physical Form	Chemical Form	Radioisotope	Specific Activity (Ci/gm)	Surface Activity (Ci/cm <sup>2</sup> )	Radiation Levels (mR/hr) Surface	Transport Index	Transport Group	Transport Index	Label	Activity (Ci)	Surface (mR/hr)	Type of Container
1	7.5	170	GLASS	Toluene	H-3	2.431	0.01	0.01	0.1	IV	0.1	LSA	Radioactive - LSA	DRUM	
2	7.5	160	GLASS	Toluene	H-3	0.23	0.01	0.01	0.1	IV	0.1	LSA	Radioactive - LSA	DRUM	
3	7.5	130	SOLID	PPG	I-125	0.71	1.5	0.2	0.2	III	0.2	LSA	Radioactive - LSA	DRUM	
4	7.5	115	SOLID	PPG	I-125	0.28	0.6	0.5	0.1	III	0.1	LSA	Radioactive - LSA	DRUM	
5	7.5	110	SOLID	PPG	I-125	0.01	0.1	0.2	0.1	III	0.1	LSA	Radioactive - LSA	DRUM	
6	7.5	80	SOLID	PPG	I-125	0.01	0.1	0.2	0.1	III	0.1	LSA	Radioactive - LSA	DRUM	
7	7.5	225	SUPPLY	SUPPLY	H-3	0.005	0.1	0.2	0.1	III	0.1	LSA	Radioactive - LSA	DRUM	
TOTALS													59.867		

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

Signature: *Ralph H. Bartz* Date: *6/1/81*  
 Signature: *Kelly M. Beatty* Date: *6/1/81*  
 Signature: *Kelly M. Beatty* Date: *6/1/81*

(Attachment A)

DISPOSAL SITE COPY