



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

MAY 5 1994

Docket No.: 030-01223  
License No.: 04-02956-02

Department of Veterans Affairs  
Northern California System of Clinics  
5500 East Second Street  
Benicia, California 94510

Attention: James S. Dooley  
Director

SUBJECT: NOTICE OF VIOLATION

This refers to the inspection conducted by John Jacobson of this office on April 19-20, 1994. The inspection included a review of activities authorized for the use of radioactive materials under your NRC license. At the conclusion of the inspection, the inspection findings were discussed with you and members of your staff.

The inspection was an examination of the activities conducted under your license as they relate to radiation safety, and to compliance with the Commission's rules and regulations. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation is of concern because it was identified by the NRC and involved a potential contamination incident which was not properly evaluated. A supervised individual failed to notify your radiation safety officer (RSO) that a package receipt survey yielded results above your written action level for removable contamination. Consequently, no evaluation of whether or not the removable contamination on the external surface of the package exceeded DOT limits was performed at the time. A subsequent evaluation by the inspector and the technologist involved indicated that the level of removable contamination on the package documented in the receipt survey record was below DOT limits. However, prompt evaluation of the extent of contamination by the licensee and notification of the carrier if limits are exceeded is essential to prevent the spread of contamination and to ensure that remedial action is taken as soon as possible.

A violation of 10 CFR 20.2103(a) for failure to document your RSO's evaluation that none of your radiation workers is required to be monitored for internal exposure is not being cited because of your prompt commitment to document the evaluation, and because the enforcement discretion criteria in Section VII.B of the Enforcement Policy were satisfied.

You are required to respond to this letter and should follow the instructions

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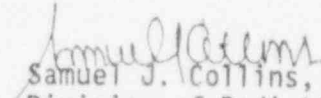
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specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Sincerely,

  
Samuel J. Collins, Director  
Division of Radiation Safety  
and Safeguards

Enclosure:  
Notice of Violation