



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V  
1990 N. CALIFORNIA BOULEVARD  
SUITE 202, WALNUT CREEK PLAZA  
WALNUT CREEK, CALIFORNIA 94596

September 9, 1981

License Nos. 53-03506-02

Hilo Hospital  
Radiology Department  
Hilo, Hawaii 96720

Attention: Donald McGrath  
Hospital Administrator

Gentlemen:

Subject: NRC Enforcement Conference

This will confirm the telephone conversation with you on September 9, 1981 concerning an enforcement conference to be held between NRC management and Hilo Hospital management. We will arrive at your office at about 9:30 am on Wednesday, September 23, 1981. The following matters will be discussed with you:

1. Noncompliance observed during the last inspection at Hilo Hospital.
2. Enforcement history at Hilo Hospital.
3. NRC Enforcement Policies and Procedures.
4. NRC actions to be taken in present situation.
5. Possible future actions by NRC.
6. Other matters of concern to NRC.

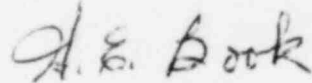
You have received the two Notices of Violation related to the last inspection. We anticipate that the enforcement conference will take between one and two hours. A representative from the State of Hawaii may be present as an observer.

September 9, 1981

While this enforcement conference is intended to be between NRC and licensee management, we have no objection if you wish to have a consultant or other appropriate persons present.

Let me know if you have any questions. My telephone number is 415-943-3700. The FTS number is 463-3700.

Sincerely,

A handwritten signature in dark ink, appearing to read "H.E. Book". The signature is written in a cursive, slightly stylized font.

H.E. Book, Chief  
Radiological Safety Branch

APPENDIX A

NOTICE OF VIOLATION

Hilo Hospital  
Radiology Department  
1190 Waiianuenue Avenue  
Hilo, Hawaii 96720

License No. 53-03506-02

As a result of the inspection conducted on July 20, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 35.21(a)(3) requires any licensee authorized under 35.13 to use teletherapy units for treating humans to cause full calibration measurements to be performed on each teletherapy unit at intervals not exceeding one year.

Contrary to this requirement, no full calibration of the teletherapy unit at Hilo Hospital was conducted between March 2, 1979 and May 12, 1981.

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

- B. 10 CFR 35.22(a) requires any licensee authorized under 35.13 to use teletherapy units for treating humans to cause spot-check measurements to be performed on each teletherapy unit at intervals not exceeding one month.

Contrary to this requirement, no spot-check measurement was performed on the teletherapy unit at Hilo Hospital between October 18, 1979 and December 6, 1979.

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

- C. 10 CFR 35.23(a) states that full calibration measurements shall be performed using a dosimetry system that has been calibrated by the National Bureau of Standards or by a Regional Calibration Laboratory within the previous two years and after any servicing that may have affected system calibration.

Contrary to this requirement, the radiological consultant stated that the dosimetry system used for the full calibration on May 12, 1981 had not been calibrated within the previous two years. The system used was a Farmer electrometer (Model 2502/3) and 0.6cc carbon tipped chamber (Model 2505/3) that was intercompared on February 1, 1980 with a calibrated Victoreen Chamber.

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

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- D. 10 CFR 35.25(a) states that records of full calibration measurements under 10 CFR 35.21 and records of calibration of the instruments used to make these measurements shall be preserved for five years after completion of the full calibration.

Contrary to this requirement, records of a full calibration which the radiological consultant stated was performed on May 12, 1981 could not be located.

This is a Severity Level VI Violation (Supplement VII).

- E. License Condition 20. states that each teletherapy machine shall be fully inspected and serviced during source replacement or at intervals not to exceed five years, whichever comes first, to assure proper functioning of the source exposure mechanism.

Contrary to this requirement, no full inspection of the teletherapy machine at Hilo Hospital was conducted between October 25, 1972 and January 30, 1978.

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

- F. 10 CFR 19.11(a) requires that each licensee shall post current copies of 10 CFR 19 and 10 CFR 20.

Contrary to this requirement, at the time of the inspection, no current copies of 10 CFR 19 and 20 were available. The regulations available for review were issued by the AEC.

This is a Severity Level VI Violation (Supplement VII).

Pursuant to the provisions of 10 CFR 2.201, Hilo Hospital, Hilo, Hawaii, is hereby required to submit to this office within thirty days of the date of this Notice, a 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. 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.

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.

dated AUG 26 1981

B. A. Riedinger, Radiation Specialist