

APPENDIX A

NOTICE OF VIOLATION

Medical College Hospitals
Warminster, Pennsylvania 18974

Docket No. 030-14750
License No. 37-18263-01

As a result of the inspection conducted on January 27, 1993, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1992), the following violations were identified:

- A. 10 CFR 35.21(a) requires, in part, that the licensee, through the Radiation Safety Officer, ensure that radiation safety activities are being performed in accordance with approved procedures. The licensee's procedure for opening packages is described in the application dated April 15, 1989, and was approved by License Condition No. 14.

Item No. 10.7 of the application states that the licensee will open packages in accordance with the procedure described in the 1984 renewal application. The licensee stated in their 1984 renewal application, dated January 20, 1984, that they would follow Appendix F procedures of Regulatory Guide 10.8, Revision 1.

Appendix F requires that the licensee maintain records of the results of checking each package, using "Radioactive Shipment Receipt Record" or a form containing the same information. The "Radioactive Material Receipt Report" requires, in part, that the technologist complete fields for radiation surveys at the surface and at a distance of one meter from the package, wipe tests for removable contamination, identification number of the package, receipt date, and the initials of the individual who performed the package receipt.

Contrary to the above, as of January 27, 1993, the licensee, through the Radiation Safety Officer, failed to ensure that radiation safety activities were being performed in accordance with the above procedure. Specifically, records of radioactive shipment receipt did not contain required information on the following dates: December 31, 1990; January 2, 4, 11, 16, 18 and 24, 1991; February 8, 12, 19, 25 and 26, 1991; March 14 and 27, 1991; April 1, 4, 8, 9 and 22, 1991; November 15 and 30, 1991; December 2 and 15, 1991; February 11, 17 and 28, 1992; March 2, 4, 15 and 21, 1992; April 16, 17, 18 and 30, 1991; May 9, 18 and 22, 1992; June 26, 1992; and July 8 and 22, 1992.

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

OFFICIAL RECORD COPY

RETURN ORIGINAL TO
ION1

IE:07

9304150153 930309
PDR ADOCK 03014750
C PDR

- B. 10 CFR 35.50(e) and 35.50(e)(2) require, in part, that a licensee retain records of annual accuracy tests of the dose calibrator for three years unless directed otherwise, and that the records include the model and serial number of the dose calibrator, the model and serial number of each source used, the identity of the radionuclide contained in the source and its activity, the date of the test, the results of the test, and the signature of the Radiation Safety Officer.

Contrary to the above, as of January 27, 1993, the licensee's record of the annual accuracy test of its dose calibrator performed on May 31, 1990, April 25, 1991, and April 23, 1992 did not include the model and serial number of the dose calibrator and the model and serial number of each source used.

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

Pursuant to the provisions of 10 CFR 2.201, Medical College Hospitals is hereby required to submit to this office within thirty days of the date of the letter which transmitted 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 violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.