November 3, 1981

License No. 53-05379-01

Kaiser Foundation Hospital
1697 Ala Moana Blvd.
Honolulu, Hawaii 96815

Attention: Carl S. Ashizawa
Administrative Assistant

Gentlemen:

SUBJECT: NRC ENFORCEMENT CONFERENCE

This will confirm the telephone conversation between you and Mr. R. Thomas of my staff on November 2, 1981, concerning an enforcement conference to be held between NRC management and the management of the Kaiser Foundation Hospital. We will arrive at your office at 9:30 A.M. on Friday, December 11, 1981. The following matters will be discussed:

1. Results of last inspection
2. NRC enforcement options
3. NRC concerns
4. Licensee management responsibilities

We anticipate that the entire meeting will take between one and 1-1/2 hours.

Sincerely,

/s/

R. H. Engelken
Director

bcc: State of Hawaii
V. Miller, NMSS
A. Grella, IE:HQ

OFFICE	RV						
SURNAME	Thomas:rc		Spencer	Engelken			
DATE	11/03/81	11/03/81	11/03/81	11/03/81			

NRC FORM 318 (10-80) NRCM 0240 OFFICIAL RECORD COPY USGPO 1980—329-824

APPENDIX A

NOTICE OF VIOLATION

Kaiser Foundation Hospital
Department of Radiology
1697 Ala Moana Boulevard
Honolulu, Hawaii 96815

License No. 53-05379-01

As a result of the inspection conducted September 28, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

A. 10 CFR 20.207(a) requires that licensed materials stored in an unrestricted area shall be secured from unauthorized removal from the place of storage.

Contrary to the above requirement, microcurie amounts of iodine-125 and Cobalt-57 for the RIA laboratory are stored in a walk-in refrigerator which is an unrestricted area. The refrigerator is used primarily by personnel in the microbiology department who are not authorized users of licensed byproduct materials.

III

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

B. 10 CFR 20.205(b)(1) requires that each licensee upon receipt of a package of radionuclides with half-lives of less than 30 days and a total quantity of more than 100 millicuries, shall monitor the external surfaces of the package for radioactive contamination caused by leakage of the radioactive contents.

Contrary to the above requirement, during the period from May 1, 1979 to September 3, 1981, 19 receipts of technetium-99m in quantities in excess of 100 millicuries were not monitored.

IV

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

C. License Condition 17 requires that the licensee shall possess and use licensed material in accordance with the statements, representations, and procedures contained in application received October 5, 1977 and letters dated October 11, 1977, January 23, 1978 and May 2, 1978; application dated September 17, 1979; and letter dated December 21, 1979.

(1) Chapter Two of the supplemental sheet to the application dated October 5, 1977 establishes the requirement and frequency of surveys.

(a) Contrary to the above requirement, during the period from January, 1981 to the date of the inspection, a total of four of the routine monthly surveys of the RIA laboratory had not been conducted.

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(b) Contrary to the above requirement, during the months of July, September and December, 1980, a total of four routine weekly surveys of the nuclear medicine laboratory had not been conducted.

(2) The "Rules for Working in the Nuclear Medicine Section" submitted with the application received October 5, 1977, states that glassware is to be cleaned only in the hot sink laboratory. Chapter Two of the supplemental sheet to the application establishes the requirement and frequency of surveys.

(a) Contrary to the above requirements, a licensee representative stated that contaminated pipettes were washed in a single person restroom in the nuclear medicine wing, and that surveys of the restroom have never been conducted.

(3) The letter of May 2, 1978 states the procedures to be used in the annual calibration of the dose calibrator.

(a) Contrary to the above requirement, full calibration of the dose calibrator had not been conducted on an annual basis. Full calibrations of the dose calibrator were conducted on December 27, 1979 and on July 13, 1981.

The above items constitute a Severity Level IV Violation (Supplement VII).

D. 10 CFR 20.401(b) requires that each licensee shall maintain records of surveys made pursuant to 10 CFR 20.201(b) in the same units used in this part.

Contrary to this requirement, records of radiation surveys of the Nuclear Medicine Laboratory conducted on March 2, 1979, March 9, 1979 and July 21, 1980 did not specify the units of measurement.

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

E. 10 CFR 19.12 requires that all individuals working in or frequenting any portion of a restricted area, shall be appropriately instructed in radiation safety matters and that the extent of these instructions shall be commensurate with potential radiological health problems in the restricted area.

Contrary to the above requirement, at the time of the inspection, an employee who had been working in the RIA laboratory for the last six months had not attended the orientation course given to employees beginning work in a restricted area.

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

F. 10 CFR 30.51(b) requires that records showing the receipt, transfer, and disposal of licensed byproduct material be maintained.

VI Contrary to the above requirement, at the time of the inspection, records of solid waste disposals made by the RIA laboratory were not maintained for 1979.

The above item constitutes a Severity Level VI Violation (Supplement VII).

Pursuant to the provisions of 10 CFR 2.201, Kaiser Foundation Hospital, Honolulu, 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. 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 NOV 6 1981

J. F. Pang

J. F. Pang, Radiation Specialist
Radiological Safety Branch