

APPENDIX A

NOTICE OF VIOLATION

Winfred Y. Lee, M.D.  
Internist Clinic, Inc.  
1441 Kapiolani Boulevard  
Honolulu, Hawaii 96814

License No. 53-09585-01

As a result of the inspection conducted July 2, 1982, and in accordance with the NRC Enforcement Policy, (10 CFR Part 2, Appendix C), 47 FR 9937 (March 9, 1982), the following violations were identified:

A. License Condition 14. states that the licensee shall possess and use licensed material in accordance with statements, representations, and procedures contained in application received June 20, 1978.

1. Item 17, Page 1 of the attachment to the application, states that all laboratory areas where radioactive materials are used in quantities larger than 100 microcuries will be surveyed weekly.

Contrary to the above requirement, weekly radiation surveys had not been performed in Suite 1111, an office and examination room where therapeutic doses up to 10 millicuries of iodine-131 had been administered to patients between the period of November 1979 and February 1982.

The above matter was identified during an internal radiological consultant audit of the Nuclear Medicine radiation safety program and reported to the licensee in a letter dated February 25, 1981. However, no corrective action was taken by the licensee until March 10, 1982, when a radiation survey was performed in response to a second internal radiological consultant audit made on February 24, 1982, which again identified this failure to conduct weekly radiation surveys.

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

2. Item 10, Page 1 of the attachment to the application, states that the dose calibrator will be checked for linearity prior to initial use and quarterly thereafter.

Contrary to the above requirement, tests to determine instrument linearity had not been performed on the dose calibrator (Serial Number 6133) during the period of use from November 21, 1979 to February 1982.

The above matter was identified during an internal radiological consultant audit of the Nuclear Medicine radiation safety program which was reported to the licensee in a letter dated February 25, 1981. However, no corrective action was taken by

