

APPENDIX

NOTICE OF VIOLATION

Devaki Ganesan, M.D.

Docket: 30-17781  
License: 35-19490-01

As a result of the inspection conducted on June 16, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982), the following violations were identified:

1. License Condition 15 requires, in part, that licensed material be used in accordance with statements, representations, and procedures contained in application dated July 31, 1980.

- a. Section 17.A of the license application describes the areas to be surveyed daily with a GM survey meter.

Contrary to this requirement, daily GM surveys have not been performed of any areas since the license was issued on January 5, 1981.

- b. Section 13.4 of the license application describes the steps to be taken to survey incoming packages of radioactive materials for leakage or contamination.

Contrary to this requirement, no surveys for leakage or contamination have been performed on incoming packages since the license was issued on January 5, 1981.

- c. Section 10.B.2.b and c of the license application states that the well ionization chamber will be monitored for accuracy, linearity of response, and geometric variation at installation.

Contrary to this requirement, at the time of the inspection on June 16, 1982, no such conditions had been monitored on the well ionization chamber installed on April 6, 1982.

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

2. 10 CFR 35.14(e)(1)(i) requires, in part, that sealed calibration sources with a half-life greater than 30 days in any form other than gas, be tested for leakage and/or contamination at intervals not to exceed 6 months.

Contrary to this requirement, the following sealed calibration sources have not been tested for leakage during the period from February 1981 to the date of the inspection.

Cs-137 250 uCi on August 1, 1980  
Ba-133 268 uCi on August 1, 1980

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

Pursuant to the provisions of 10 CFR 2.201, Devaki Ganesan, M.D., is hereby required to submit to this office, within 30 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) the corrective steps which will be taken to avoid further violations; and
- (3) the date when full compliance will be achieved.

Consideration may be given to extending your response time for good cause shown.

Dated July 21, 1982