APPENDIX A

NOTICE OF VIOLATION

Greenville Hospital
Jersey City, New Jersey 07305

Docket No. 030-08198
License No. 29-14859-01

As a result of the inspection conducted on September 26, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1990), the following violations were identified:

A. 10 CFR 35.21(a) requires that medical licensees appoint a Radiation Safety Officer (RSO) responsible for implementing the radiation safety program. 10 CFR 35.21(b)(2) requires that the RSO establish and implement written policy and procedures for using byproduct material safely.

1. The licensee's RSO has established for these procedures those which are described in NRC Regulatory Guide 10.8, Revision 1, Appendix G. Appendix G requires, in part, that disposable gloves be worn at all times while handling radioactive material.

   Contrary to the above disposable gloves were not worn on September 26, 1990 while handling radioactive material. Specifically, the technologist was observed holding a syringe containing radioactive material without gloves.

2. The licensee's RSO has established for these procedures those which are described in Item 24 of the license application dated May 19, 1987. Item 24 requires that the licensee assign personnel monitoring devices to individuals who work in an area where radioactive materials are used or stored.

   Contrary to the above, as of September 26, 1990, the licensee had not assigned personnel monitoring devices to an individual who worked in an area where radioactive materials are used or stored. Specifically, a nuclear medicine technologist who worked part time in the nuclear medicine department had not been assigned personnel monitoring devices by the licensee.

   These are Severity Level IV violations (Supplement VI).

B. 10 CFR 35.50 (b)(1) requires that licensees check each dose calibrator for constancy with a dedicated check source at the beginning of each day of use and that the check be done on a frequently used setting.

Contrary to the above, as of September 26, 1990, the licensee did not check the dose calibrator for constancy with a dedicated check source at the beginning of each day of use nor was the check done on a frequently used setting. Specifically, the constancy check had not been performed on 11 occasions between June 7, 1990 and September 26, 1990.

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

C. 10 CFR 35.51(c) requires that, at the time of survey meter calibration, the apparent exposure rate from a built-in or owner-supplied check source be determine and recorded and that each survey instrument be checked with the dedicated check source each day of use.

Contrary to the above, as of September 26, 1990, the licensee's Technical Associates Model PUG-1 survey meter did not have the apparent exposure rate from a built-in or owner-supplied check source determined at the time of calibration nor was the survey meter checked with the dedicated check source each day of use.

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

D. 10 CFR 35.53(c) requires that records of the measurement of radiopharmaceutical dosage contain, in part, the time of measurement.

Contrary to the above, as of September 26, 1990, records of radiopharmaceutical dosage measurements did not contain the time of measurement.

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

E. 10 CFR 35.70(h) requires each licensee retain a record of each survey for three years. The record must include, in part, a plan of each area surveyed and the surveyor's initials.

Contrary to the above, as of September 26, 1990, survey records have not included a plan of each area surveyed or the surveyor's initials.

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

F. 10 CFR 35.70(a) requires that licensees' survey with a radiation detection survey instrument at the end of each day of use all areas where radiopharmaceuticals are routinely prepared for use or administered.

Contrary to the above, as of September 26, 1990, area surveys were not performed on days when radiopharmaceuticals were routinely prepared for use or administered. Specifically, surveys were not performed on 14 occasions between February 16, 1990 and September 25, 1990.

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

G. 10 CFR 35.205(c) requires that before receiving, using, or storing a radioactive gas, licensees calculate the amount of time needed after a spill to reduce the concentration in the room to the limit listed in 10 CFR 20, Appendix B, Table I, that a record of these calculations be made, and that licensees post the calculated time, and safety measures to be instituted in case of a spill at the area of use.

Contrary to the above, as of September 26, 1990, the licensee had not posted the calculated time, nor the safety measures to be instituted in case of a spill at the area of use (the camera room).

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

H. 10 CFR 35.205(e) requires that licensees check the operation of collection systems for radioactive gases each month and measure the ventilation rates available in areas of use of radioactive gases each six months.

Contrary to the above, as of September 26, 1990, the operation of the collection system for radioactive gases had not been checked monthly nor were ventilation rates measured each six months in areas where radioactive gases were used. Specifically, collection systems were checked at greater than monthly frequencies and ventilation rates had not been checked since August 24, 1988, a period greater than six months.

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

Pursuant to the provisions of 10 CFR 2.201, Greenville Hospital 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.