

APPENDIX A

NOTICE OF VIOLATION

Hillcrest Hospital  
Pittsfield, Massachusetts

Docket No. 030-08788  
License No. 20-15240-01

During an NRC inspection conducted on October 20, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 19.12 requires, in part, that all individuals working in a restricted area be instructed in the precautions and procedures to minimize exposure to radioactive materials, in the purpose and functions of protective devices employed, and in the applicable provisions of the Commission's regulations and licenses.

Contrary to the above, as of October 20, 1993, an individuals who was working in the nuclear medicine hot lab, a restricted area, had not been instructed in the applicable provisions of the regulations and the conditions of the license. Specifically, the nuclear medicine technologist was not instructed in the procedure to check survey instruments for proper operation.

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

- B. 10 CFR 35.50(b)(3) requires, in part, that a licensee test each dose calibrator for linearity over the range of its use between the highest dosage that will be administered to a patient and 10 microcuries.

Contrary to the above, the licensee's dose calibrator linearity test performed on January 19, 1993 did not include the activities below 122 microcuries.

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

- C. 10 CFR 35.51(a)(3) requires that a licensee conspicuously note the apparent exposure rate from a dedicated check source, as determined at the time of calibration, and the date of calibration on any survey instrument used to show compliance with 10 CFR Part 35.

Contrary to the above, as of October 20, 1993, the licensee did not determine the apparent exposure rate from a dedicated check source at the time of calibration of its Ludlum Model 14C survey instrument, and the licensee was using this survey instrument to show compliance with 10 CFR Part 35.

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

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Pursuant to the provisions of 10 CFR 2.201, Hillcrest Hospital is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.