

Appendix

NOTICE OF VIOLATION

Biomedical Scanning Services

License No. 24-18087-01

As a result of the special inspection conducted on May 4 and 5, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. License Condition No. 14 requires that all licensed material be possessed and used in accordance with statements, representations and procedures contained in application dated March 22, 1978; and letters dated May 23, 1978, June 23, 1978, April 26, 1979, August 18, 1980, February 26, 1981, and March 30, 1981; and diagrams received April 24, 1981.

The license application dated March 22, 1978, states that individuals shall wear monitoring devices (film badge or TLD) at all times while in areas where radioactive materials are used or stored. TLD finger badges shall be worn during elution of the generator and during preparation, assay, and injection of radiopharmaceuticals.

Contrary to this requirement, an individual failed to wear a TLD finger badge during the injection of a radiopharmaceutical at Sparta Community Hospital District.

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

2. License Condition No. 14 requires that all licensed material be possessed and used in accordance with statements, representations and procedures contained in application dated March 22, 1978; and letters dated May 23, 1978, June 23, 1978, April 26, 1979, August 18, 1980, February 26, 1981, and March 30, 1981; and diagrams received April 24, 1981.

The license application dated March 22, 1978, states that at the end of each day, all contaminated materials will be taken from the hospital and transferred to the waste storage areas at the base location.

Contrary to this requirement, it was learned from the inspector's observations and statements of licensee representatives that technetium-99m contaminated alcohol swabs were disposed of in the normal trash at Marshall Browning Hospital.

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

3. License Condition No. 14 requires that all licensed material be possessed and used in accordance with statements, representations and procedures contained in application dated March 22, 1978; and letters dated May 23, 1978, June 23, 1978, April 26, 1979, August 18, 1980, February 26, 1981, and March 30, 1981; and diagrams received April 24, 1981.

The license application dated March 22, 1978, states that disposable gloves shall be worn at all times while handling uncontained radioactive materials.

Contrary to this requirement, disposable gloves were not worn at all times while handling uncontained radioactive materials. Specifically, an individual failed to wear disposable gloves while administering an uncontained radiopharmaceutical at Sparta Community Hospital District.

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

4. The following items pertain to the shipment of licensed material from your facility.

10 CFR 71.5(a) requires that no licensee shall transport any licensed material outside of the confines of his plant or other place of use unless the licensee complies with the applicable regulations of the Department of Transportation in 49 CFR Parts 170-189.

- a. 49 CFR 173.393 states that each package containing radioactive materials must be capable of meeting the standards in 173.398(b) and 173.24. 173.398(b) describes the standards for Type A packaging.

Contrary to this requirement, it was learned through statements of licensee representatives that the packaging you use to transport radioactive materials does not meet the standards for Type A packaging.

- b. 49 CFR 173.393(h) states that no significant removable radioactive contamination shall be on the external surface of packages containing radioactive materials.

Contrary to this requirement, it was learned through statements of licensee representatives that wipe tests were not performed to ensure that no removable radioactive contamination was present on the packages shipped from your hot lab to area hospitals.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance:

(1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Original Signed by J. R. Miller

6-22-82

Dated

J. R. Miller, Chief
Technical Inspection Branch