

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 82-02

License No. 04-08313-03

Licensee: Department of the Navy

Navy Regional Medical Center

Camp Pendleton, California 92055

Facility Name: Navy Regional Medical Center

Location: Licensee Facility

Conference Conducted: June 24, 1982

Participants: *G. S. Spencer* 7/2/82
G. S. Spencer, Director, Division of Radiological
Safety and Safeguards Programs Date Signed

R. D. Thomas 7/2/82
R. D. Thomas, Chief, Materials Radiation Protection
Section Date Signed

Wm. Mark Grayson 7/1/82
Wm. Mark Grayson, Radiation Specialist Date Signed

Approved by: *H. E. Book* 7/2/82
H. E. Book, Chief, Radiological Safety Branch Date Signed

Summary:

Enforcement Conference on June 24, 1982 (Report 82-02).

The following matters were discussed:

1. Enforcement history and items of noncompliance associated with the April 23, 1982 inspection.
2. NRC Enforcement Policies and Procedures.
3. NRC actions to be taken in the present situation.
4. Possible future actions by the NRC.
5. Other matters of concern to the NRC.

This enforcement conference involved a total of one hour and 20 minutes onsite by three NRC representatives.

DETAILS

1. Enforcement Conference Participants

Capt. N. Pulicicchio, Commanding Officer
Capt. L. E. Nelson, Director of Clinical Services
LCDR F. E. White, Radiology
C. L. Hensley, RSO
G. S. Spencer, Director, Division of Radiological Safety and
Safeguards Programs
R. D. Thomas, Chief, Materials Radiation Protection Section
W. M. Grayson, Radiation Specialist

2. Enforcement Conference

On June 24, 1982 an enforcement conference was held at the Naval Regional Medical Center, Camp Pendleton, California with the individuals listed above participating. The enforcement conference was related to the recent routine safety inspection of the Nuclear Medicine Program authorized by NRC License Number 04-08313-03. The enforcement conference was announced in a letter to the licensee dated June 21, 1982. A copy of that letter is attached.

The Notice of Violation dated June 11, 1982 had been received by the licensee. A copy of Appendix A to the Notice of Violation is attached.

During the conference, Mr. R. Thomas, NRC, reviewed the past enforcement history of the licensee. The individual items of noncompliance which were identified during the last inspection were discussed. Mr. Thomas stated that the number and type of noncompliances found during the recent inspection were indicative of an ineffective radiation safety program and associated administrative audits. The need for strong participation on the part of management to control the overall licensed program was stressed. The importance of management audits was discussed. It was also explained that if a violation was not corrected satisfactorily, if it was repeated, or if a similar violation occurred, escalated enforcement action would probably be taken by the NRC. It was stressed that this provision would remain in effect for two years or until the next inspection, whichever was longer. The licensee was informed that an early reinspection would be conducted by the NRC.

Mr. Spencer discussed NRC's enforcement, policy and procedures as published in 47 FR 9987. A copy of the NRC's enforcement policy was given to the licensee. Escalated enforcement actions such as civil penalties, orders to modify, suspend, or revoke licenses and orders to cease and desist were discussed. The relative significance of the different severity levels and supplements within which these violations would fall was discussed. Mr. Spencer, NRC, informed the licensee that the enforcement action to be taken by the NRC at this time consisted of the Notice of Violation in conjunction with the enforcement conference which was being held.

Mr. Grayson explained that the licensee is to follow the operating procedures specified in letter and application dated September 12, 1979. It was pointed out that requested changes in operating procedures are not authorized until approved by NRC licensing staff. Mr. Grayson made the suggestion that the licensee review their existing operating procedures to see if there are any other changes which could be made to increase the effectiveness of the radiation safety program or reduce record keeping requirements. It was suggested that all desired changes be submitted as part of a single amendment to the license. The potential problem areas associated with the Chief Nuclear Medicine Technician acting as the Radiation Safety Officer (RSO) were also briefly discussed.

3. Conclusions

The licensee's response to the enforcement conference was acceptable, Commitment for improving radiological safety through increased management audits was made. The enforcement conference was adjourned at 2:30 p.m.