

APPENDIX A

NOTICE OF VIOLATION

John F. Kennedy Memorial Hospital
Philadelphia, Pennsylvania 19124

Docket No. 030-13374
License No. 37-17817-01

As a result of the inspection conducted on March 2, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1988), the following violations were identified:

- A. 10 CFR 35.21(a) requires that medical licensees appoint a Radiation Safety Officer responsible for implementing the radiation safety program. 10 CFR 35.21(a)(2) requires that the Radiation Safety Officer establish and implement written policy and procedures for performing periodic radiation surveys; performing checks of survey instruments and other safety equipment.

1. The licensee's Radiation Safety Officer (RSO) has established for these procedures those which are described in NRC Regulatory Guide 10.8, Revision 2, Appendix N.

Appendix N requires that the weekly survey include wipes for removable contamination levels and that the instrumentation be sufficiently sensitive to detect the presence of 2000 dpm/100 cm².

Contrary to the above, as of March 2, 1990, weekly survey wipes tests were not performed for removable contamination. Specifically, you did not possess the required instrumentation with the required sensitivity.

2. The licensee's Radiation Safety Officer (RSO) has established for these procedures those which are described in NRC Regulatory Guide 10.8, Revision 2, Appendix C.

Appendix C requires that the dose calibrator accuracy test be performed at installation; the linearity test be performed at installation and quarterly thereafter; and that the geometric dependence be performed at installation.

Contrary to the above, as of March 3, 1990, the linearity, accuracy and geometry dependence tests were not performed as required. Specifically, the linearity test was not performed from August 27, 1988 to April 4, 1989, a period greater than one quarter; a new dose calibrator was installed October 29, 1989 and the linearity test was performed December 1989, approximately two months after installation; the accuracy, geometry dependence and linearity tests were performed January 8, 1990, not upon installation as required.

These are Severity Level IV violations. (Supplement VI)

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Pursuant to the provisions of 10 CFR 2.201, John F. Kennedy Memorial 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.