

Appendix

NOTICE OF VIOLATION

Owosso Memorial Hospital

License No. 21-11475-01

As a result of the inspection conducted on December 10, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. License Condition No. 17 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in application dated April 5, 1978; letter dated June 20, 1978 and letter received July 13, 1978.

Letter dated June 20, 1978, Item No. 2, entitled "Procedure for Safely Opening Packages Containing Radioactive Material" states that, a wipe test will be taken of incoming source containers.

Contrary to the above, as of December 10, 1982, monitoring of packages containing radioactive materials has not included the required wipes of the source container.

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

2. 10 CFR 20.201(b) states, each licensee shall make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. 10 CFR 20.201(a) states, as used in the regulations in this part, "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to this requirement, your RIA laboratory failed to make surveys as were necessary to assure compliance with 10 CFR 20.301, a regulation that describes authorized means of disposing of licensed material contained in waste. Specifically, as of December 10, 1982, no surveys have been made of potentially contaminated iodine-125 solid waste prior to disposal in the normal "cold" trash.

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

3. 10 CFR 20.203(e) requires that rooms in which specified amounts of licensed material are used or stored be conspicuously posted "Caution Radioactive Material."

Contrary to the above, on December 10, 1982, the entrance to the laboratory where the RIA exams are performed was not posted. This area routinely uses and stores quantities of iodine-125 in excess of 10 times the quantity specified in Appendix C of Part 20.

This is a Severity Level V Violation (Supplement IV).

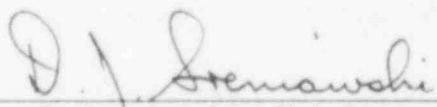
4. 10 CFR 19.11(a) and (b) require that current copies of Part 19, Part 20, the license, license conditions, documents incorporated into the license, license amendments, and operating procedures be posted, or that a notice describing these documents and where they may be examined, be posted. 10 CFR 19.11(c) requires that a Form NRC-3, "Notice to Employees," be posted. 10 CFR 19.11(d) requires that these documents or notices appear in a sufficient number of places to permit individuals engaged in licensed activities to observe them on the way to or from a licensed activity to which the document applies.

Contrary to the above, on December 10, 1982, neither the documents nor the notices were posted in or near the laboratory where the RIA exams are performed.

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

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.

12/23/82
Dated


D. J. Sreniawski, Chief
Materials Radiation Protection
Section 2