

Appendix A

NOTICE OF VIOLATION

Veterans Administration Medical Center
4951 Arroyo Road
Livermore, California 94550

License No. 04-09450-02

As a result of the inspection conducted December 1-2, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C) 47 FR 9987 (March 9, 1982), the following violations were identified:

A. License Condition 19 states, in part, that the licensee shall possess and use licensed material in accordance with statements, representations, and procedures contained in application dated September 19, 1977; letters dated February 17, 1978, August 18, 1978, and August 5, 1980; letters with enclosures dated March 3, 1981; letter dated October 26, 1981; Items I and II of letter dated January 13, 1982; Model ALARA program contained in Appendix 0 of Regulatory Guide 10.8, October 1980; and letter dated April 21, 1982.

1. Appendix J which was submitted as an attachment to the letter dated February 17, 1978, requires that all radiopharmaceuticals administered to patients will be assayed for activity in a dose calibrator to an accuracy of 10 percent.

Contrary to the above requirement, while the dose calibrator was awaiting repair, no confirmatory physical measurements were made of radiopharmaceuticals which were prepared for use by the licensee prior to administration of doses to patients during the period between November 7 and December 3, 1980.

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

2. Item 2.c. in Appendix 0 of Regulatory Guide 10.8 (October 1980) states that the licensee's Radiation Safety Committee will perform a quarterly review of occupational radiation exposures for maintaining exposures ALARA.

Contrary to the above requirement, the licensee's Radiation Safety Committee did not review occupational radiation exposures during the second and third quarters of 1982.

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

3. Item 3.a. in Appendix O of Regulatory Guide 10.8 (October 1980) requires that the Radiation Safety Officer perform a quarterly audit of records of radiation level surveys conducted in unrestricted and restricted areas to determine that they were at ALARA levels during the previous quarter.

Contrary to this requirement, records of radiation surveys performed by the licensee were not reviewed by the Radiation Safety Officer during the second and third quarters of 1982.

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

- B. 10 CFR 35.14(f)(2) states that a quarterly physical inventory shall be conducted to account for all sources received and possessed pursuant to 10 CFR 35.14(d)(4). Records of the inventories shall be maintained for inspection by the Commission and shall include the quantities and kinds of byproduct material, location of sources, and the date of the inventory.

Contrary to the above requirements, a sealed source inventory had not been performed during the second and third quarters of 1982, during the first, second and third quarters of 1981, and during the first, second, and third quarters of 1980.

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

Pursuant to the provisions of 10 CFR 2.201, Veterans Administration Medical Center at Livermore is hereby required to submit to this office within thirty days of the date of 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 items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

December 23, 1982

Date



R. D. Thomas, Chief
Materials Radiation Protection Section