

APPENDIX A

NOTICE OF VIOLATION

Veterans Administration Hospital  
4435 Beacon Avenue, South  
Seattle, Washington 98108

License No. 46-00990-01

As a result of the inspection conducted on November 8 and 9, 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 requires that except as specifically provided otherwise by the license, the licensee shall possess and use licensed material in accordance with statements, representations, and procedures contained in application dated April 4, 1977, letters dated December 3, 1977, April 26, 1977 and August 31, 1977, and Model ALARA Program contained in Appendix O of Regulatory Guide 10.8 (Revision 1), "Guide for the Preparation of Applications for Medical Programs," October, 1980.

- (1) Attachment F of the application dated April 4, 1977 requires that the dose calibrator be calibrated for accuracy on a semiannual basis, that linearity checks be conducted on a semiannual basis and that constancy checks be conducted on a daily basis.
  - a. Contrary to the above requirement accuracy calibrations of the dose calibrator had not been conducted in 1980 and only one accuracy calibration had been conducted in 1981.
  - b. Contrary to the above requirement linearity checks of the dose calibrator had not been conducted in 1980 and only one linearity check had been conducted in 1981.
  - c. Contrary to the above requirement, daily constancy checks had not been conducted on a number of days. Some specific examples of missed days in 1982 were May 26-28; June 11, 14 and 18; July 2; August 6; and October 19-22.

The above items constitutes a Severity Level IV Violation.  
(Supplement VI)

- (2) Appendix O of the Regulatory Guide 10.8 requires that the Radiation Safety Committee perform an annual review of the radiation safety program, including ALARA considerations, operating procedures and past exposure records, inspections, and consultations with the radiation protection staff on outside consultants. It also requires the Radiation Safety Committee to perform a quarterly review of the occupational radiation exposures.

Contrary to the above requirements, the Radiation Safety Committee had neither conducted an annual review of the radiation safety program in 1981, nor had the Committee performed a quarterly review of the occupational radiation exposures since the last quarter of November 1981 to the date of the inspection.

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

- (3) Section 8 of the "Radiation Safety Plan and Health Physics Manual" submitted with the application dated April 4, 1977 requires that routine area exposure and contamination surveys will be conducted in accordance with prescribed frequency standards based on Table 7 of the manual. The frequency standards stipulates that all laboratories where the use of radioactive materials exceed quantities listed in Column II of Table 7 will be surveyed at weekly intervals by the laboratory staff. In addition, monthly surveys by the RPO are also required by Section 8 of the manual.
- a. Contrary to the above requirement weekly contamination surveys by the Nuclear Medicine Laboratory had not been conducted during the weeks of July 5, 19 and 26, and for the weeks of September 13, 20 and 27 during 1982. Also weekly radiation surveys of the Nuclear Medicine Laboratory had not been conducted during the weeks of June 7 and 28, July 5 and 19, August 30, and September 20 and 27 of 1982.
  - b. Contrary to the above requirement monthly surveys by the RPO had not been conducted during the months June 1980; June 1981; August 1981; January 1982.

The above items constitutes a Severity Level IV Violation.  
(Supplement VI)

- (4) Section 1 of the "Radiation Safety Plan and Health Physics Manual" submitted with the application dated April 4, 1977 requires that the Radiation Safety Committee meet no fewer than four times each year.

Contrary to the above requirement, the Radiation Safety Committee met only three times in 1980 on February 22, July 3, and November 26.

This repetitive item consistutes a severity Level V Violation.  
(Supplement VI)

- (5) Attachment E of the application dated April 4, 1977 requires that portable survey instruments will be calibrated at six month intervals or following repair.

Contrary to the above requirement the survey instruments had been calibrated on an annual basis in 1980 and 1981.

The above item constitutes a Severity Level V Violation.  
(Supplement VI)

- B. 10 CFR 20.401 requires that each licensee shall maintain records showing the radiation exposures of all individuals for whom personnel monitoring is required pursuant to 20.202.

Contrary to the above requirement film badge records for an employee who was provided with a film badge were not maintained for July, August, September, October, and November of 1980.

The above item constitutes a Severity Level V Violation.  
(Supplement IV)

Pursuant to the provisions of 10 CFR 2.201, Veterans Administration Hospital, Seattle 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.

dated DEC 21 1982

Original signed by  
R. D. Thomas

R. D. Thomas, Chief, Materials Radiation  
Protection Section