APPENDIX A

NOTICE OF VIOLATION

Providence Hospital
Radiation Safety Office
3200 Providence Drive
Anchorage, Alaska 99504

License No. 50-17838-01

As a result of the inspection conducted on July 21-22, 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 17 states that licensed materials be utilized in accordance with statements, representations and procedures contained in applications dated October 26, 1977 and August 24, 1979, and letters dated December 23, 1977, January 24, 1978, February 8, 1978, October 19, 1978, and May 22, 1978. The October 26, 1977 application Item (11) states that portable survey instruments will be calibrated yearly.

Contrary to the above requirement, a Victoreen Survey Meter Model No. 491, Serial No. 1862, utilized by Cancer Therapy, was originally calibrated by the Victoreen Instrument Company on August 7, 1980, and was not calibrated again until November 30, 1981, a period in excess of 15 months.

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

B. 10 CFR 35.14(b)(5)(i) requires that each licensee who possesses and uses sources or devices as authorized by 10 CFR 35.100, Group VI, shall cause each source or device containing more than 100 uCi of byproduct material with a half life greater than thirty days, except iridium-192 seeds encased in nylon ribbon, to be tested for contamination and/or leakage at intervals not to exceed six months.

Contrary to the above requirement, at the time of the inspection, the licensee had not performed leak tests on the strontium-90 eye applicator, which contains 100 mCi of Sr-90, since December 18, 1981, a period in excess of seven months.

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

C. 10 CFR 35.14(b)(5)(v) requires that each licensee who possesses and uses sealed sources pursuant to 10 CFR 35.100, Group VI, shall conduct a quarterly physical inventory to account for all sources and devices. This inventory is to include the quantities and kinds of byproduct material, the location of sources and devices, and the date of the inventory.

Contrary to the above requirement, quarterly inventories were not conducted between December 19, 1980 and July 20, 1982 a period in excess of 19 months.

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

D. 10 CFR 35.14(b)(4)(ii) requires that nuclear medicine technologists who perform elutions of technetium-99m from molybdenum-99/technetium-99m generators shall be specifically trained in molybdenum-99 breakthrough testing.

Contrary to the above requirement, at the time of the inspection, the licensee was not providing molybdenum-99 breakthrough training to nuclear medicine technologists who elute technetium-99m from molybdenum-99/technetium-99m generators.

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

Pursuant to the provisions of 10 CFR 2.201, Providence Hospital, Anchorage, Alaska 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 AUG 17 1982

Original signed by
R. D. Thomas

R. D. Thomas, Chief
Materials Radiation Protection Section