

FEB 7 1983

APPENDIX A
NOTICE OF VIOLATION

Veterans Administration Medical Center
Washington, D.C.

Docket No. 30-01314
License No. 08-00942-05

As a result of the inspection conducted on January 5, 1983, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 20.201(b), "Surveys", requires that each licensee make such surveys as may be necessary to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "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.
1. Contrary to the above, as of January 5, 1983, surveys (evaluations) were not made to assure compliance with that part of 10 CFR 20.101 which limits the dose to the extremities of individuals. Specifically, personnel monitoring was not provided to evaluate the dose to the extremities of student nuclear medicine technologists working in the restricted areas. In addition, no evaluation was made of the radiation dose to the hands and fingers of personnel who inject patient doses and whose TLD finger badges were not processed for December 1980, May 1981, January 1982 and May 1982.
 2. Contrary to the above, as of January 5, 1983, surveys were not made to determine that individuals who handled significant quantities of iodine-125 were not exposed to airborne concentrations exceeding the limits specified in 10 CFR 20.103. Specifically, surveys (evaluations, including air monitoring and thyroid monitoring where applicable) were not made during an iodination using of 10 millicuries of iodine-125 on or after July 15, 1982.

These are Severity Level IV violations. (Supplement IV)

- B. 10 CFR 20.102(a) requires that, for individuals first entering the restricted area, the occupational dose received at other facilities in the current calendar quarter be determined.

Contrary to the above, as of January 5, 1983, the occupational dose for the current calendar was not determined for students who work part-time in the restricted area and part-time at other facilities where licensed materials are used.

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

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- C. Condition 21 of License No. 08-00942-05 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated December 22, 1978.
1. Items A.4.b and c of Section II, page 14, of the "Radiation Safety Guide for Radioisotope Use" submitted with this application, requires that protective barriers and other shields be used whenever possible and that mechanical devices be used whenever their aid will assist in reducing exposures.

Contrary to the above, as of January 5, 1983, when technicians prepared unit doses of technetium-99m products, they failed to use a syringe shield, a device which reduces exposure.

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

2. Item 17.a, page 19, of this application requires the measurement of radiation levels with a survey meter in laboratories where gamma-emitting radioisotopes are used.

Contrary to the above, as of January 5, 1983, survey of radiation levels in Room IF-137 had not been made. The inspector identified gamma radiation levels of approximately 5 milliroentgens per hour on an absorbent pad in this area.

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

3. Item K, pages 11 and 12, of the "Radiation Safety Guide for Radioisotope Use" submitted with this application requires a monthly inventory record of use of radioisotopes.

Contrary to the above, as of January 5, 1983, no record of inventory and use was maintained for 10 millicuries of iodine-125 received on July 15, 1982 and for other licensed materials received when there was no Radiation Safety Officer.

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

Pursuant to the provisions of 10 CFR 2.201, the Veterans Administration Medical Center, Washington, D.C., 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.