

NOTICE OF VIOLATION

Heartland Hospital West  
St. Joseph, Missouri

Docket No. 030-30121  
License No. 24-13246-02

As a result of the inspection conducted on August 22, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1989) (Enforcement Policy) the following violations were identified:

1. License Condition No. 13 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in certain referenced documents.

The referenced letter dated September 23, 1987, requires in "Guidelines For Treatment of Patients", Item 4., that the prescription calculations be verified with the physicist or dosimetrist before treatment is administered.

Contrary to the above, the physicist stated that the prescription calculations were not verified by the physicist or dosimetrist before each treatment was administered from the inception of the requirement on October 19, 1987, through August 22, 1990. Specifically, prescriptions calculations were verified by the physicist within two days of the initiation of each treatment.

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

2. License Condition No. 13 requires licensed material be possessed and used in accordance with the statements, representations, and procedures contained in certain referenced documents.

The referenced application dated July 15, 1987, requires in Item 8 that the licensee establish and follow the procedures for personnel training programs as described in Appendix D of Draft Regulatory Guide FC 414-4, dated December 1985. Appendix D requires that records of initial and refresher training be maintained until the NRC terminates the teletherapy license.

Contrary to the above, the licensee failed to maintain records of refresher training given to radiation therapy personnel during the fourth quarter of 1989.

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

3. 10 CFR 35.59 (d) requires that a licensee retain leakage test records for five years. The records must contain the model number, and serial number if assigned, of each source tested, the identity of each radionuclide and its estimated activity, the measured activity of each test sample expressed in microcuries, a description of the method used to measure each test sample, the date of the test, and the signature of the Radiation Safety Officer.

Contrary to the above, from January 1989 through July 1990, the records of leakage test results for the cobalt-60 teletherapy source did not contain the model number and serial number of the source tested, its estimated activity, the measured activity of each test sample expressed in microcuries, and the signature of the Radiation Safety Officer.

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

4. 10 CFR 35.632(a) requires a licensee to perform full calibration measurements on each teletherapy unit before medical use following replacement of the source and at intervals not exceeding one year.

10 CFR 35.632(b) states, in part, that to satisfy Paragraph (a), of this section, full calibration measurements must include determination of the uniformity of the radiation field and its dependence on the orientation of the useful beam.

Contrary to the above, the licensee failed to satisfy the full calibration requirements of 10 CFR 35.632(a) in that the uniformity of the radiation field and its dependence on the orientation of the useful beam was not determined from February 5, 1988 through August 22, 1990, a period exceeding one year.

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

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 violation: (1) the corrective steps that have been taken and the results achieved; (2) the corrective steps that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated

September 12, 1990

Roy J. Caniano  
Roy J. Caniano, Chief  
Nuclear Materials Safety  
Section 2