

Appendix

NOTICE OF VIOLATION

Hamilton Clinic

License No. 21-20217-01

As a result of the inspection conducted on September 17, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. License Condition No. 15 states that the licensee shall possess and use licensed material in accordance with statements, representations and procedures listed in application dated September 23, 1981, and referenced letters. This application states that your dose calibrator will be calibrated in accordance with Regulatory Guide 10.8, Appendix D, Section 2 which requires (a) daily constancy checks; (b) annual accuracy tests (using Cs-137, Co-57 and Ba-133); and (c) quarterly linearity tests, which include plotting the measured net activity over time verses the calculated activity for the same time periods.

Contrary to the above, (a) constancy checks were not performed between July 6 and August 10, 1982; (b) no full accuracy test has yet been performed; and (c) no expected activity calculations were made, and therefore, no plot was made to demonstrate that the instrument is linear and functioning properly.

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

2. License Condition No. 15 states that the licensee shall possess and use licensed material in accordance with statements, representations and procedures listed in application dated September 23, 1981, and referenced letters. This application states that individuals in your employ handling licensed byproduct material will wear both whole body and extremity (ring) exposure monitoring devices.

Contrary to the above, from September 10 through 17, 1982, byproduct materials were used by your nuclear medicine technologist is the absence of an extremity (ring) badge.

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

3. License Condition No. 15 states that the licensee shall possess and use licensed material in accordance with statements, representations and procedures listed in application dated September 23, 1981, and

referenced letters. This application states that your survey instruments will be calibrated annually and that records of instrument calibrations will be maintained.

Contrary to the above, no records were available to indicate that your Nuclear Chicago Model - 2612 has been calibrated within the past year.

This is a Severity Level V 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 item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further 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

9/27/82

D. J. Sreniawski
D. J. Sreniawski, Chief
Materials Radiation Protection
Section 2