APPENDIX A

NOTICE OF VIOLATION

Fairbanks Memorial Hospital
1650 Cowles
Fairbanks, Alaska 99701

License No. 50-13648-01

As a result of the inspection conducted on September 2 and 3, 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 18. states that the licensee shall possess and use licensed material in accordance with statements, representations, and procedures contained in the letter dated January 23, 1981 with an enclosed modified application dated March 5, 1980.

Item 24, "Personnel Monitoring Devices" of the application dated March 5, 1980 states that whole body film badges and finger rings will be worn by users of licensed materials.

Contrary to the above requirement, no whole body badge or finger ring was worn by Dr. McConkey during uses of a 50 millicurie strontium-90 eye applicator between September 19, 1979 and September 2, 1982.

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

B. License Condition 18. states that the licensee shall possess and use licensed material in accordance with statements, representations, and procedures contained in a letter dated January 23, 1981 with enclosed modified application dated March 5, 1980.

Page 120 of the modified application dated March 5, 1980 states that dose calibrator linearity tests will be conducted on a quarterly basis and that the test results will be recorded.

Contrary to the above requirement, no linearity check was performed on the CRC-17 dose calibrator between January 6, 1981 and September 3, 1982, a period in excess of nineteen months.

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

C. 10 CFR 20.108 states that, "Where necessary or desirable in order to aid in determining the extent of an individual's exposure to concentrations of radioactive material, the Commission may incorporate appropriate provisions in any license, directing the licensee to make available to the individual appropriate bio-assay services and to furnish a copy of the reports of such services to the Commission."

In a letter to Fairbanks Memorial Hospital dated December 8, 1980, Mr. Lamastra of the Materials Licensing Branch in NRC Headquarters stated, "A bioassay program should be established for personnel who handle therapeutic liquid iodine-131. As a minimum, thyroid counts should be obtained approximately twenty-four (24) hours after exposure. Submit the precautionary measures and the bioassay procedures that you will follow."

Page 124 of the modified application dated March 5, 1980 which was submitted on January 23, 1981, and which is referenced in License Condition 18. states that personnel who handle therapeutic iodine-131 will have a thyroid count performed within 24 hours after the exposure.

10 CFR 20.401(c)(1) states that records of bioassays made pursuant to 10 CFR 20.108 shall be preserved until the Commission authorizes disposition.

Contrary to the above requirements, no records were maintained of bioassays conducted on personnel who handled therapeutic doses of iodine-131 between September 19, 1979 and September 2, 1982.

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

D. 10 CFR 20.401(a) states that each licensee shall maintain records showing the radiation exposures of all individuals for whom personnel monitoring is required under 10 CFR 20.202.

Also, page 124 of the modified application dated March 5, 1980 and referenced in License Condition 18. states that pocket dosimeters will be worn by personnel caring for patients containing therapeutic doses of iodine-131 for treatment of thyroid carcinoma.

Contrary to the above requirements, at the time of the inspection, no record had been maintained of the radiation exposures received by nursing personnel who cared for a patient who received a dose of 49.6 millicuries of iodine-131 on December 27, 1979.

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

E. License Condition 17B states that records of leak test results shall be kept in units of microcuries and maintained for inspection by the Commission.

Contrary to this requirement, at the time of the inspection, no record was available of a leak test conducted on a 50 millicurie strontium-90 eye applicator between May 19, 1981 and June 21, 1982.

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

Pursuant to the provisions of 10 CFR 2.201, Fairbanks Memorial Hospital 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.

SEP 16 1982

DATE

Original signed by
H. E. Book

R. D. Thomas, Chief
Materials Radiation Protection Section