In Reply Refer To: License: 49-23121-01 Docket: 30-20277/90-01

Community Hospital
ATTN: Douglas McMillan
Administrator
2000 Campbell Drive
Torrington, Wyoming 82240

Gentlemen:

Thank you for your letter of December 24, 1990, in response to our letter and attached Notice of Violation both dated December 3, 1990. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine whether full compliance has been achieved and will be maintained.

Sincerely,

Original Signed By:

A. Bill Beach, Director Division of Radiation Safety and Safeguards

cc: Wyoming Radiation Control Program Director

bcc w/copy of licensee letter:

DMB - Original (IE-07)

RDMartin

ABBeach

LAYandell

MRodriguez, OC/LFDCB (MS 4503)

CLCain

WLFisher

TGaines

NMSIS

MIS System

RIV Files (2)

RSTS Operator

RIV:NMSIS AD() ADGaines:nh 1/15/91

C:NMSISGAC CLCain 1/15/91 D:DRSS ABBeach

101240060 910116 R 94 LIC30 48 -23121-01 PDR 54°9

DECEOVED JAN - 3 1591

Community Hospital 2000 Campbell Drive Torrington, WY 82240

December 24, 1990

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington DC 20555

Re: Reply to Notice of Violation

Dear Sires

This letter is in response to the NRC communication dated December 3, 1990, concerning the inspection at Community Hospital (Inspection report 30-20277/90-01). Our responses to the items detailed in the Notice of Violation are provided below.

This was an oversight. Radiation Safety Meetings are now scheduled with all participants concerned one year in advance during the months of December, March, June, and September. The office of the Hospital Administrator will take responsibility for scheduling meetings. This should eliminate any possibility of meetings being missed in the future. The meeting for the fourth quarter of 1990 was held on December 12, 1990. Full compliance has been achieved as of this date.

Items_21 Both of these items were an oversight. The quality 6_10 control procedures for the dose calibrator have been amended as of this date to include:

- i) a constancy check on a frequently used setting on each day that the dose calibrator is used
- e linearity test on the dose calibrator on at least a quarterly basis, (and also upon installation and following service). The reports are to be signed by the Radiation Bafety Officer. Full compliance has been achieved as of this date.

9101090004

U.S. Nuclear Regulatory Commission December 24, 1990 Page 2

- These items are admitted. During the calibration of the Victoreen CDV-700 survey meter performed during September, 1990, an attempt was made to bring the indicated exposure rate to within 20% of the calculated exposure rate. However, on one range, the unit could not be adjusted to within 20%, presumably, due to the age of the unit. A new survey meter has been purchased and is available for use at the Hospital. (Eberline Model ESP-1, equipped with a model MP-270 probe). This unit is capable of dose rate measurement over the range i to 1000 mrom/hr, and will be used for all future surveys. Full compliance has been achieved as of this date.
- Item_61
 This item is admitted. A more sensitive instrument for performing area wipe test surveys has been acquired by the Hospital (Eberline Model ESP-1 meter equipped with a HP210L probe and used in the scalar mode). A protocol is being implemented to assure that wipe samples that exceed 2000 dpm of contemination are detected. Full compliance will be achieved by or before January 15, 1991.
- This item is admitted. The problem was caused by lack of subtraction of the zero offset reading of the dose calibrator. The protocol for measuring molybdenum breakthrough has been revised to specify that the dose calibrator zero offset reading must be subtracted from each reading used to determine the molybdenum breakthrough concentration. The technologist performing the measurements has been instructed in the revised protocol. Full compliance has been achieved as of this date.

U.S. Nuclear Regulatory Commission December 24, 1990 Page 3

In order to improve the overall effectiveness of management control over licensed activities, the Hospital Administrator will review on a quarterly basis (concurrent with the Radiation Safety Committee meetings) the results of all Quality Control activities. This review will be designed to ensure that all planned Quality Control activities are carried out and that problems, when identified, are promptly resolved.

This response is submitted under oath.

Yours sincerely.

Doug McMillan Administrator

John Goddard, Ph.D. Consultant

JG/tp

CC: U.S. Numiean Regulatory Commission Regional Administrator S11 Ryan Plaza Drive Suite 1000 Arlington, TX 75011

Signal boton me this soft day of December, 1998.

Rotory Pulle

Docket No. 30-20277/90-01 License No. 49-23121-01

Community Hospital
ATTN: Douglas McMillan
Administrator
2000 Campbell Drive
Torrington, Wyoming 82240

Gentlemen:

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT NO. 30-20277/90-01)

This refers to the routine, unannounced radiation safety inspection conducted by Messrs. Anthony D. Gaines and Gilbert Guerra of this office on October 11, 1990, of the activities authorized by NRC Byproduct Material License 49-23121-01, and to the telephonic discussion of our findings held by the inspectors and Mr. Charles L. Cain with members of your staff on October 17, 1990. The enclosed NRC Inspection Report 30-20277, 90-01 documents this inspection. This also acknowledges the records we received from your consultant on October 24, 1990, to finish our review of your progress.

The inspection was an examination of the activities conducted under the license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of the license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, independent measurements, and observations by the inspectors.

During this inspection, certain of your activities were a und not to be conducted in full compliance with NRC requirements. Consciountly, you are required to respond to this matter in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice. Part 2, Title 10, Code of Federal Regulations. Your recense should be based as the specifics contained in the Notice of Violation enclosed with this lette.

The inspectors also reviewed the actions you had taken with respect to the two violations observed during our previous inspection conducted on June 15, 1987. They verified that the corrective actions for one of these violations had been implemented. However, we noted that one violation has recurred since the previous inspection. This item is identified as Violation No. 1 in the attached Notice.

It was noted by our inspectors that the oversight of the radiation safety program was primarily performed by your consultant, and that the individual named as radiation safety officer on your license acted in a secondary role. The NRC holds the licensee and, in particular, the radiation safety officer accountable for ensuring that the program is performing as it should and in

*RIV:NMSIS ADGaines:nh //90 *NMSIS *C:NMSIS GGuerra CLCain //90 //90 *D:0855 ABBeack

*Previously concurred

9012100369

ZE.07

compliance with all NRC regulations. In particular, there are certain duties spelled out in the regulations that are to be accomplished by the radiation safety officer. The day-to-day oversight that should have been provided by the radiation safety of the contract of th

Therefore, we are concerned about the implementation of your program in the area of management control that permitted these violations to occur. Consequently, in your reply to this letter, you should describe those specific actions planned or taken to improve the effectiveness of the management control of your licensed operations, with particular emphasis on actions planned or taken to prevent further violations.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Original Signed By:
A. B. BEACH

A. Bill Beach Director Division of Rad tich Safety and Saleguards

Enclosures:

Appendix A - Notice of Violation Appendix B - NRC Inspection Report 30-20277/90-01

00:

Wyoming Radiation Control Program Director

bee:

DMB - Original (IE-07)

ABBeach

MRodriguez, OC/LFDCB (4503)

*CLCain

*GGuerra

*MIS System

*RSTS Ope. ator

RDMartin LAYandell

*WLFisher

*ADGaines

*NMSIS

*RIV Files (2)

*REHall, URFO

APPENDIX A

NOTICE OF VIOLATION

Community Hospital Torrington, Wyoming Docket No. 30-20277/90-01 License No. 49-23121-01

During an NRC inspection conducted on October 11-24, 1990, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violations are listed below:

 10 CFR 35.22(a)(2) requires that the licensee's Radiation Safety Committee (RSC) meet at least quarterly.

Contrary to the above, although the RSC met in August 1989 upon opening the nuclear medicine department after its shutdown from Earch 1988 to August 1989, the RSC did not meet during the fourth quarter of 1989.

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

This is a repeat violation.

2. / 10 CFR 35.50(b)(1) requires, in part, that the licensee check each dose calibrator for constancy daily with a dedicated check source on a frequently used setting.

Contrary to the above, from June 1987 to October 1990, the technetic '99m setting on the dose calibrator was not checked even though this was the only _atting used.

B. 10 CFR 35.50(b)(3) requires, in part, that the licensee test each dose calibrator for linearity upon installation and at least quarterly thereafter. 10 CFR 35.50(e)(3) requires, in part, that records of linearity tests include the signature of the radiation safety officer.

Contrar: to the above, the licensee failed to test the dose calibra or for linearity during the fourt quarter of 1989, and the record of the linearity test performed in September 1990 did not include the signature of the radiation safety officer.

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

3. A. 10 CFR 35.51(b) requires, in part, that when calibrating a survey instrument, the licensee consider a point as calibrated if the indicated exposure rate differs from the calculated exposure rate by not more than 20 percent.

1012100370

Contrary to the above, the record of the September 1990 calibration of the lowest reading scale of the licensee's only survey meter, a Victoreen Model CDV-700, affirmed that the indicated exposure rate differed from the calculated exposure rate by more than 20 percent.

B. 10 CFR 35.220 requires, in part, that a licensee authorized to use byproduct material for imaging and localization studies have in its possession a portable radiation measurement survey instrument capable of measuring dose rates over the range 1 millirem per hour to 1000 millirem per hour.

Contrary to the above, as of October 11, 1990, the licensee did not have in its possession a survey instrument capable of measuring dose rates in excess of 50 millirem per hour.

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

10 CFR 35.70(f) requires that the licensec conduct the surveys required by 10 CFR 35.70(e) so as to be able to detect contamination on each wipe sample of 2000 disintegrations per minute.

Contrary to the above, as of October 11, 1990, the licensee had not performed any calculations or determinations to demonstrate that surveys of wipe samples could detect 2000 disint grations per minute of contamination. The licensee has used to dose calibrator to perform such surveys. This device would not reasonably be expected to detect this level of contamination.

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

5. 10 CFR 35.204(b) requires that a licensee that uses molybdenum-99/ technetium-99m generators for preparing a technetium-99m radiopharmaceutical measure the molybdenum-99 concentration in each eluate or extract.

Contrary to the above, from August 1989 through October 1990, the molybdenum-99 concentration was not measured in that an improper method was used to determine the amount of molybdenum-99 in the eluate.

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

Pursuant to the provisions of 10 CFR 2.201, Community Hospital is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and if applicable, a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly

marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at Arlington, Texas this 3rd day of December 1990

APPENDIX B

U.S. NUCLEAR REGULATORY COMMISSION REGION IV

NRC Inspection Report: 30-20277/90-01

License: 43-23121-01

Docket: 30-20277

Licensee: Community Hospital

2000 Campbell Drive

Torrington, Wyoming 82240

Inspection At: Community Hospital

Torrington, Wyoming

Inspection Conducted: October 10-24, 1990

Inspectors:

Anthony D. Gaines, Radiation Specialist

Nuclear Materials and Safeguards Inspection

Section

Gilbert Guerra, Radiction Specialist Trainee Nuclear Materials and Safeguards Inspection

Section

Date/13/90

Approved:

Charles L. Cain, Chief, Nuclear Materiais and

Safeguards Inspection Section

Inspection Summary

Inspection Conducted October 11-24, 1990 (Report 30-20277/90-01)

Areas Inspected: This was a routine, unannounced radiation safety inspection of a byproduct material program authorizing the medical use of radiopharmaceuticals for clinical diagnostic procedures. The inspection included the review of organization and management, dose calibrator use, survey instrument use, and radiation surveys.

Results: This inspection identified various violations of NRC requirements. Collectively, the violations identified are indicative of a lack of management oversight of the radiation safety program.

9012110089

Within this inspection, the following violations were identified:

Organization and Management

Failure of the radiation safety committee to meet at least quarterly. (Section 4)

Dose Calibrator Use

- Failure to check frequently used isotope settings during dose calibrator constancy conks. (Section 5)
- Failure to test the linearity of the dose calibrator quarterly. (Section 5)
- Failure to properly measure the molybdenum-99 concentration in generator eluates. (Section 5)

Survey Instrument Use

- Failure to calibrate the lowest scale on the survey meter. (Section 6)
- railure . possess a survey instrument that measures dose rates from 1 millirem per hour to 1000 millirem per hour. (Section 6)

Radiation Surveys

Failure to ascertain that wipe samples surveys were able to detect contamination levels as low as 2000 disintegrations per minute. (Section 7)

DETAILS

1. Individuals Contacted

*Douglas McMillan, Administrator
*William T. Ward, M.D., Radiation Safety Officer and Authorized User
*John Goddard, Consultant
Kathy Schwartzkopf, X-Ray Technologist

*Indicates those present during exit interview.

2. Followup on Previous Inspection Findings (June 15, 1987)

(Open) Violation of 10 CFR 35.22(a)(2) (30-20277/87-01): Failure of the radiation safety committee (RSC) to meet quarterly. The inspectors determined during the current inspection that the RSC did not meet quarterly. This item is considered open.

(Closed) Violation of 10 CFR 35.22(a)(4) (30-20277/87-01): Failure of the licensee to include in RSC meeting minutes an ALARA review. The inspectors determined by reviewing the RSC meeting minutes that ALARA reviews were included in the minutes. This item is considered closed.

3. Program Overview

The licensee is authorized to use medical products for diagnostic clinical procedures. The only radioisotope used by the licensee for diagnostic procedures has been technetium-99m. The technetium has been obtained from a molybdenum-99/technetium-99m generator. The licensee has received a generator approximately every 2 weeks.

The licensee has experienced some organizational changes since the last inspection on June 15, 1987. The nuclear medicine technologist (NMT) that was employed during the last inspection left February 22, 1988. The licensee could not find a replacement for the technologist until August 24, 1989. Because of this, the licensee had closed the nuclear medicine department from February 22, 1988, to August 24, 1989. Since reopening the nuclear medicine department, the licensee performed on the average only 5 - 6 diagnostic procedures a month. The license was renewed in June 1990.

4. Organization and Management

The organizational structure was found to be as required, and key personnel have been identified in Section 1 of this report. The radiation safety officer (RSO) and the consultant had been employed by the hospital in their current capacities during previous inspections. The administrator and the NMT were employed after the June 15, 1987, inspection.

The RSO has been the authorized user for the program and also had performed radiology services for other hospitals in the area. Many of the RSO's duties have been, therefore, performed by a consultant.

Quarterly and annual reviews required by 10 CFR 35.22 were performed. The findings of the reviews have been discussed briefly in the RSC meetings, as indicated by RSC minutes.

The RSC, according to 10 CFR 35.22(a)(2), is required to meet at least quarterly. The inspectors, by reviewing records and through discussions during the telephonic exit meeting conducted October 17, 1990, observed that the RSC did not meet during the fourth quarter of 1989. At the exit meeting the consultant stated that the meeting was not held during the fourth quarter of 1989 due to the fact that they believed the meeting held in August 1989, just after reopening the nuclear medicine department, would suffice. The failure of the RSC to meet at least quarterly was identified as a repeat violation of 10 CFR 35.22(a)(2).

One violation was identified.

5. Dose Calibrator Use

The licensee has maintained a Picker dose calibrator, Serial Number 217056-R. The dose calibrator has been used to assay generator elutions, which is ranged from a to 540 millicuries, and patient doses that generally as anged from a to 20 millicuries.

It was noted by the inspectors that when the dose calibrator constancy checks had been performed, the technetium-99m setting was not checked. The constancy checks were only performed on the cesium-137 and the cobalt-57 setting. The failure to check the dose calibrator for constancy on a frequently used setting was identified as a violation of 10 CFR 35.50(b)(1).

The inspectors could not be provided a dose calibrator linearity record for the fourth quarter of 1989. The consultant stated during the telephonic exit meeting that the dose calibrator had not been tested for linearity during the fourth quarter of 1989. He again stated that this was due to the fact that they performed a linearity test in August 1989 after resuming licensed activities and thought that that would suffice. Also, it was noted by the inspectors that the record of the linearity test performed in September 1990 was not signed by the RSO. The failure to test the dose calibrator quarterly for linearity and to have the RSO sign a linearity test were identified as violations of 10 CFR 35.50(b)(3) and 10 CFR 35.50(e)(3), respectively.

technetium-99m generators for preparing a technetium-99m radiopharmaceutical measure the molybdenum-99 concentration in each eluate or extract. The licensee used the above type of generator and prepared technetium-99m radiopharmaceuticals. A review of molybdenum-99

breakthrough records for August 1989 to October 1990, by the inspectors, indicated that the molybdenum-99 concentrations in the eluates were routinely greater than .15 microcuries of molybdenum-99 per millicurie of technetium-99m. This level is greater than what is allowed to be administered to humans. After discussing this with the consultant at the exit meeting, it was apparent that the NMT used an improper procedure to measure the molybdenum-99 activity, therefore giving inaccurate results for the molybdenum-99 concentrations. The failure to properly measure the molybdenum-99 activity, which in turn gave inaccurate results for the molybdenum-99 concentrations in the eluates was identified as a violation of 10 CFR 35.204(b).

Three violations were identified.

6. Survey Instrument Use

The inspectors observed that the licensee only had one survey instrument, a Victoreen Model CDV-700. This survey instrument was last calibrated in September 1990. From the record of this calibration it was noted that on the lowest scale the calibration factors at two different points were 1.57 and 1.38. This indicated that the lowest scale was not calibrated within plus or minus 20 percent. At the exit meeting the consultant stated that the lowest scale could not be calibrated to within plus or minus 20 percent. The failure to calibrate the lowest scale by no more than 20 percent was identified as a violation of 10 CFR 35.51(b).

The Victoreen Model CDV-700 survey instrument that the licensee possessed had a range of 0 to 50 millirem per hour. Therefore, this survey meter was not capable of measuring cose rates over the range 1 millirem per hour to 1000 millirem per hour. This was identified as a violation of 10 CFR 35.220.

Two violations were identified.

7. Radiation Surveys

The licensee routinely performed area wipe surveys and obtained results of these surveys by reading the wipes in the dose calibrator. The dose calibrator was not evaluated by the licensee to show that it was able to detect contamination on the wipe sample of 2000 disintegrations per minute. This device would not reasonably be expected to detect this level of contamination. Therefore, this was identified as a violation of 10 CFR 35.70(f).

One violation was identified.

8. Exit Interview

The inspectors and the Chief, Nuclear Materials and Safeguards Inspection Section, held a telephonic exit interview with the staff members noted in Section 1 on October 17, 1990. The specific findings as noted in this report were reviewed. The discussion also focused on the need for effective management control and the need for prompt and effective corrective actions for the problems identified.

HRC JORN 786	INSP	ECTOR'S	U.S. NUCLE	AR REGULA	TORY COMMISSIO	Gaines	Antha	A
			nd Enforcer	nent		2 Can	are	
HAPPETONS (74.8//	9,6	ilber	+				THE PERSON NAMED IN COLUMN	
	DELANGE AT THE OWNER, MINISTER	rymka na storomer	*****	CTION	SOCKET NO IN A		**************************************	NEST INSPEC DATE
CINSH V	1400#		149	-	SOCKET NO 14 BI	orta-	AQ	380 WO 14
Community	Hospit		X - 450	36 1	030,202	22	9001	, 10,9,2
			D - 061					
PERIOD OF INVESTIGATION INSE	HC1ION		- Linear States	NSPECTION PE	non-divisional constitution demonstrated and practice actions benefities	THE PARTY NO.	CONTRACTOR OF STREET	DE OF REGION HO CONDUCT
MO DAY YA MO D	0 X	7 - NESIDE	AL OFFICE STAFF IT INSPECTOR MARCE APPRAISA	L TEAM	OTHER			1616C 0530 Margower Report
M. s a matismonal B. M.	and any local division in the local division	and the second	200	acceptable of	and the state of		- 155 C	C. W. S. S. S. S.
REGIONAL ACTIO		W - 14	HTY (fee)		08 - MGB(! VISI?	NOUCTED Check one dox	SEC	I - NOURTING THE
2 - ARGIONAL OFFICE LETTER		(3) - UN	FORCEMENT		OF - SPECIAL (+)	Printed.	T VER	15 - INVESTIGATION
		25 - 44	SAFT AUDIT	in the second se	30 - MAT ACCT	3 - MACE	AND RESIDENCE AND RESIDENCE PRODUCED IN	
ennement hitchestellenskriebbeset Insist Parken i nemet ac semetellensestille einen, o	and the second and th	-	I RUMBER	1-108014	ENT CONSERENCE	LADAT CONTAIN 1 790	new pinding specific con-	REPORT TRANSMITTAL DATE
A B C D	AND ADDRESS OF THE PARTY OF THE	OF VIOL	ATIONS NO	117571048	HELD	N FORMA TION	ARC FORM	AND DESCRIPTION OF THE PARTY OF
Congression I - CLEAR							OR REG	10 HQ (Q#
1 - VOLATION		1 4 8	1 5 1 5	A 8 5 1	7	1000	MO I DAY	78 MO 247 19
A - VIOLATION & C	MONTANYE	05			1 - YES	1 - YES	1203	90
THE RESERVE AS A SECOND	A Decision of the Control of the Con			See STATE	material in the		G	The Contract of the
AEG MODULE NUMBER INSP	HODULE NEOR	INATION	MODULE REC	FOLLOWUP	MIC MODULE NUMB	terrance recommendate and expension exceptions	0.04-41-05	MODULA REGISCHOWUS
DAD Z	SAMES SAMES SAMES SAMES	ACE 160	arrestance commence	Ĭ	186	communication of the party of t	K 5 9	the contrast to contrast to the section of the sect
NAMES	PRICARITY DARGCT IN THOMEFFE STAMFING EXPLADE	PERCENT COMMPTE TO DATE	STATUS PHASE MASHIGA CHAPTE	PRDCEO MUNICIPA HEVEL	HYPE MUMBER PHASE MANUAL CHAPTER PROCED	HUMBER TEVEL SEO & PROPERTY DIRECTOR	PERCEN COMPUT TO DATE	STATUS PHIASE ANDROSE PHILL BLD MUSEURS
53,017,031	0.0.3		ess	111	0 5 8 4 8 7	5.01	1-12-0-0-	9
		1.			Insparan at			
*	H				REGUITEMENT		-	
adamand a mademanian are some as a second	opensed resorten articos	1,0,0	C		0 53,018	0,01 4 6,	1 100	Companies of a contract of the companies of the contract of th
licensed				- 1	initial	0		
merenais		a de compressed	encaperante manerà mandes		inspection	OR (ades surge over lever who make	
programs	N	-				Of .	character and market and	
1 1 8 3 8 2 2 2	0,0.2	1,0,0	c		5 9 2 7	0,21 4 0,0	1	a contract or and a second sec
radiation		111		111	Followup	on o		
protection					violation			
	of .	-			HI WELL	o		
586740	0.01	1,0,0	C	-	91	A	understand a section and a	- A wife and considerate and the state of th
			or water verification of account.		hiladada andaradanakanak	\$	relicant light contract to the second	and the same of the same of the same of the same of
trimportation			-		113.3	6		
e circut stout NCI II	ol .	-	-			0		
94230 827 35 75 40	12 15 15	70 ng	to 30 27	Services 38	10 2 4 6 15:20	m- m Q ia	75 NS - NS	18 30 PI - 100 E - 1
Midth House	medule.	n waters	RAT CON	AND ARRESTMENT TOWN	Fill in leading	to the last the same of the Board of the same professional	Service and a se	

INCOSTS INCOSTS DEPOST		NAT			-		580	5871100	
(Continuation)	030202	44	-		40	01	8	VIOLATION SEVERITY 3R DEVIATION	MELATED SUP
Office of Inspection and Enforcement				-			C	111111	0 40
YIOLATION OR DEVIATION LEnter up to 2400 characters for sec	on Hom If the text exceeds	this nymber.	it will be	neces	MAY NO	eraphr	one Limi	I anne to 50 characters ago	7 7
2	Contract the state of the state	-		-	-		Minera Name		
1	***************************************	-		-				-	-
10 CFR 35.22(a)(2) require	es that the 1	cense	9 'S	Radi	ati	on S	afet	y	
Committee (RSC) meet at le	east quarter);	y							
. Contrary to the above, ait	though the RS	Cmet	in A	ugus	t 1	989	upon	opening	
the nuclear medicine depar	rtment after	its sh	utdo	wn f	rom	Mar	ch 1	988 to	
August 198%, the RSC did n	ioc meet duri	ng the	TOU	run	qua	rter	0.1	1303	4.00
1			THE REAL PROPERTY.		-		Traine No. Comm.		
10	***	NOTES WHERE STREET							
11.		CONTROL CONTROL CONTROL	COLUMN STREET				ann communicati	*************************	Control of the second s
12		*******	A STATE OF THE PARTY OF	ration atom year					
13			*******						
14			THE RESIDENCE	Manager or control			***********	THE PARTY OF THE P	CONTRACTOR OF STREET, ST. OF ST. OF ST. OF ST. OF ST. OF ST. OF ST
16		CHARLES AND REAL PROPERTY.	Citros resistes	- Anna Propins	-	-	*****		*********************
16.	-					*********	or maneause		
17							COLUMN THE SHARE AND A		A CONTRACTOR & CONTRACTOR OF THE PARTY OF
18		Attended a control of control				- The State of the		***************************************	
19	4.1/4						Minimum (c. N. sels	N. C.	
20.							MENNEX-MIT NEXT	****	THE PERSON NAMED IN COLUMN
21.						SECOND CASE			Charles Marketine and Antonion
23									Section of the sectio
n			************						THE RESERVE OF THE RESERVE OF
24									
8	E-7 (100 (100 (100 (100 (100 (100 (100 (10						-		N TOTAL STREET, ST.
N			-		-	**********			
77		-				-	**********		
28			**************************************			******	Designation of the last of the		
2		NAME AND ADDRESS OF	-						
30		-	CAMPAGE	-	-		****	-	
31		Wilderson was need			***********				
2	NAMES AND ADDRESS OF THE OWNER, T			Popular of States	an salabour	-			Manheir Charles Million Street
2)					-				
34		-			ani sa canang			*******	
3		-	net or constant		of colors and other		N. H. C. Britanian and St. Bri		
36	*****	*************		-	market se		*********		
37		-	-			TO COLUMN	PT 1000000		
48	****						-		Control of the last of the las
2			ne cinoren	THE RESERVE A	-	-	-	******	The second second second

IR MIC USOS	INCRECTOR IS SECOND	-	707	NOTE OF	777	THE PERSON NAMED IN	-	St. destroyable	mapmond	3 E A	-	1	1	00	-	MARK WOLLD
	INSPECTOR'S REPORT	100	100	0	11	-	-	100	211	A	-	136.61	TV MY	ERITY CN	MELAT	ED 50
Office	(Continuation) of Inspection and Enforcement	-	-	es e de condens	-	*****	-	· Marina	-	0	1	3	4 5	4	ame@conwick	Second made
Onice	or mapecinon and Emorcement	-	-		-	C-Parketing and	-	-	-	0	1_	_	XI.		0 0	necuse
YIOLA	TION OR DEVIATION SERVE UP TO FROM CHARDESETS FOR B	is them	If the test	exceeds II	HE NUMBER	It will be it	-000000	ITY IO DE	rearrea	# LIMIT	ir tes n	0 50 c	no fice	רש שפנה	- 4	ran unamed
ACTION OF CHICAGO	The chartest of the contents, of the service of the contents o	************		FCILISTERNIS SIN		-	ORNING MANUAL PROPERTY.	********	****	and the latest desired to	-	NAME OF TAXABLE PARTY.	-	-	description	
2	10 CED 35 50(b)(1) (100
2	10 CFR 35.50(b)(1) require	1, 10	part	, the	at th	e lice	ense	e ch	reck	eac	h d	056				
	calibrator for constancy d frequently used setting.	LITY	with	a dec	21 Cat	ed che	BCK	sour	ce	on a						
																1998
	Contrary to the above, from	Jun	e 198	7 to	Octob	er 19	90.	the	ter	chne	e fue	n~9	Qm			See
	setting on the dose calibrationly setting used.	tor	was n	ot cr	necked	even	th	ough	thi	SW	as t	the	2112			***
-																-
B.	10 CFR 35.50(b)(3) require	5, 1	n par	t. th	at th	e lic	ense	no +	0 e +	0.25	n etc					
1	COLUMN TOT THE STATE OF	non	1 11 6 4 3	1 2 4 4		P	3	- A				228				
10.	VINCTURE LUNCE TO LEE 35 501	D 11 5	1 200	I I T W EN EN	5 55	on on another	4. 6	0.00			400				- Citrara	or explorations.
11	linearity tests include th	e 51	gnatu	re of	the	radia	tior	sa	fety	of	fice	r.			minutes	THE STREET, SQUARE, SA
************	Contrary to the above, the	lice	ensee	fail	ed to	tost	the	do		2144						
CONTRACTOR LABORAGE	THE REPORT OF MALE PARTY OF THE PROPERTY.	73 731112	5 Kr dr 40 M	Ph. W	C3 52 53	n m at . A.	Marie Laboratoria Const	E Britain Co.	the state of the s	46.					(many)	-
	ringarity case performed 1	u 261	otemb	er 19	90 di	d not	inc	lude	e th	e s	qna	tui	e			
14	of the radiation safety of	rice									*					
16.															*********	THE COMMERCE OF
18.	THE PARTY STATE OF A STATE OF THE PARTY OF T		A STATE A STATE OF THE REAL PROPERTY.	-	TERTI SECURIO		Mark extension	THE PERSON	- Marian Company		-	-	A SHIRING IN A		WWW.CONCESSOR	*********
7		THE RESERVE AND ADDRESS.	********	Tropics, Street		THE RESTAURANCE AND ADDRESS OF	-	-	Printer Street,				-	(de monte des pro-	-	
	The state of the s	-	-	TER AND PROPERTY.		-	NAMES OF THE OWNER,	*******	***		OTHER PERSON	chortness o	-	ant Nation Segment	******	********
6.	The same of the sa	Mileson Private			-	Times - replacement			-	about Freehouse	renomer:	-			Name of Street Street	
-		CONTROL BUILDING														
10.															HEREN THE PARTY OF	
11.				*************	North State State					OF STATE OF THE PARK	TELCH TON			***************************************	NAMES AND ADDRESS OF	
a		**********	NA SECULO DE SECULO CATA	**********	*****			THE RESIDENCE OF THE PARTY OF T	-	-	*****					A DESIGNATION OF THE PARTY OF T
23	The second secon	m: otmenna	-	*****	***************************************	*****		SERVICE PROPERTY AND ADDRESS OF THE PERSON NAMED IN COLUMN 1		****	-	e de contrata	a je ricesa			
all and the same of the same o		a management	TO E STREET, S	e de la completa del la completa de		-		-	T-STATE OF THE STATE OF THE STA		-	-	-	-	*********	_
24.	THE RESIDENCE OF SOME OF THE SECOND PROPERTY	-	-	-		Name Andrews Street Management	-	PERSONAL PROPERTY.								
M.	MANUFACTURES AND A STATE OF THE PARTY OF THE	MA INDIVIDUAL	TOTAL PROPERTY													
18.														-	NEWS A. PLANSE PROCESS	
17.	The second secon	- The Property of the Park	ORDER SERVICE	The box foliage comes	***************************************	**************************************	-	PRETT, INVESTOR	TOW STATE STATE		-	-	district receive	-		FT-10-10-10-10-10-10-10-10-10-10-10-10-10-
	CAY OF THE PROPERTY OF THE STREET, AND ADDRESS O	R F T III PROPERTY	**********			NALES VIII A CONTRACTOR OF THE PARTY OF THE	****	ATTENDO TRACT	INCHES CRITICAL	Linkerkrotopolose	****			MERT OF STREET, SAC	er management	-
No.	WANTED TO SERVICE OF THE ACT OF THE SERVICE OF THE	MARKET 2 - THAT		-		NAMES OF THE OWNER, WHEN PERSON NAMES OF THE OWNER, WHEN PERSO		*****	******	Delta Schoolster	bennon	overea.	-			-
9				-	ř		-	-	The same also	-		*****		· ·		
C.		-	TE PORTO PERSONAL		Marie Services Services	-	THE CHARLES	-	ne series con con		-					
1												THE STATE OF				l ii
2										-	e de Sales Berlas	- Constant	*** ****	PROPULATION	and the works	-
)				normal E-rose	Periodical Action is		**********	nert and the second	-	OR CALL STREET,	THE SHE SHE SHE	-	********	MATCH THE R		***
-	THE STATE OF STATE ASSESSMENT ASS	-	CONTRACTOR SEA		***********	-	*****	Remote Com	TOTAL CONTRACTOR	- APPENDENCE AND ADDRESS	-			-	A CHARLES OF REAL PROPERTY.	MANCO ARRAY
A		*****		-	***********	- Miller William Spanisher	TOTAL SPRINGS	***********		**********	-	di Antonia	-	-	-	-
5.			-	-		-	-		******		THE PERSON LA	MANUE (N				Mark Property
6					***************************************		-						July 15			
,														-		THE CHARLES
1000			CAT TANKS (MICHAEL &	Printer and reconstruction	-		-	************	met annexes		THE RULE WAS	PERSON INC.		-		NAME OF TAXABLE PARTY.
		THE PERSON NAMED IN	-			-			*********	orania de la constanta de la c	*****	*******	******	NAME OF TAXABLE		
Control of the Contro																

Office	(Continuation) of Inspection and Enforcement	03020277	19	1017	6 prospersonerson	1,100	SITE SU
					0	H II	
	TION OF DEVIATION Uniter up to 2400 characters for a	each most if the test exceeds this number if e	HII be necessary a	paraphrase	Limit lines to 80 che	ractory sech)	The room and the
1 1 1	10 CFR 35.51(b) requires, instrument, the licensee of exposure rate differs from 2D percent.	CONSIGNE A DOINE OF SE	1 d be made and	12	The state of the s	d n	
7 C	ontrary to the above, the owest reading scale of the odel CDV-700, affirmed tha alculated exposure rate by	licensee's only surve t the indicated exposi	y meter, ure rate	a Vic	torwan		
12.	10 CFR 35.220 requires, i byproduct material for im possession a portable rad measuring dose rates over per hour.	dation measurement su	n studies	have	in its	of em	
16.	Contrary to the above, as its possession a survey i excess of 50 millirem per	nstrument capania of 1	the lice	nsee d dose	id not hav	re in	
14.							
19.					-		
11.				-	-	-	
12.	and the second	***************************************		-	C		***
13		Medical Co., Calculation of the second of th	TOTAL CONTRACTOR OF THE PERSON AS	denine terminance	-	-	
м		THE RESERVE OF THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TO THE OWNER, THE OW	W. chiattanas escentares qua	Marie L. Williamson	The second secon	*****	OPCHIONISTERS OF MANAGED
0	MODEL PRINCIPAL MANAGEMENT AND				THE RESIDENCE AND ADDRESS OF A PARTY OF THE	TOTAL CALL STREET, TOTAL STREET, SA	THE SERVICE VALUE OF THE SERVICE
N.			CONTRACTOR AND ADDRESS OF THE PARTY.				
2				*******			
8.							
0.			***		-		
1		AND DESCRIPTION OF THE REAL PROPERTY OF THE PERSON OF THE		-		-	
2.	THE RESERVE AND ADDRESS OF THE PROPERTY OF THE		*************	-			-

A.			A CONTRACTOR OF STREET, STREET	Name and Address of the Owner, where	MITTER CONTRACTOR OF THE PERSON NAMED IN COLUMN	-	
3				PROMINE CONTRACTOR	***********		
-					The comments are the 12 to 12		
				THE X STREET WAY			
-						70.00	
-							

U.S. NUCLEAR REGULATORY COMMISSION

INSPECTOR'S REPORT (Continuetion) Office of inspection and Enforcement	03020277	900	\$10 687 00	MELATED SUI
YIOLATION OR DEVIATION LETTER OF TO JAGO ENGINEERING FOR B	ach from if the feat exceeds this number I	I will be necessary to payage		38 39
10 CFR 35.70(f) requires the 10 CFR 35.70(e) so as to be sample of 2000 disintegrations of wipe samples could detect contamination. The license surveys. This device would level of contamination.	at the licensee cond able to detect cont ons per minute. f October 11, 1990, or determinations to t 2000 disintegratio e has used the dose	uct the survey amination on the licensee of the demonstrate of the per minute calibrator to	ys required by each wipe had not that surveys of perform such	
10.		OCCUPATION OF THE STREET, SALES OF THE SALES OF THE STREET, SALES OF THE SALES OF T		
12.				
13				***
18.		New York Committee of the Committee of t	AND THE RESIDENCE OF THE PARTY WAS ASSESSED.	
18.				
18				
19.				
20				
22.				-
21	480	<u> </u>		THE PROPERTY AND PROPERTY OF THE PARTY OF TH
24.		⁷ 3		
26.	and the contraction of computation could place and operational court (the contract courts)	***************************************		
A		and the American section of the section of		
20.			and analysis to do so is some reduced a sold an extendion one was a summer	TA TO STATE
11.				
12				
SI.				
N				
35	A Promiser and Anna Congr. in the contract of			
		Margara et aut des la cala et a cala et		
a			The transfer of the transfer of the debuggion with a best state of the internal and the state of the debuggion of the debuggi	NACE OF STREET, ADDRESS STREET, MAY IS AND

'NSPECTOR'S REPORT (Continuation) Office of Inspection and Enforcement	0302277	9001 4 23 3	N SITE SUP
, VIOLATION OR DEVIATION (Énter up to 2400) characters for	r each main. It into rest exceptes this number it	elli de necessary lo paraphrace. Limit limas le 30 character	o cecn ;
2 10 CFR 35.204(b) requires molybdenum-99/technetium-9 radiopharmaceutical measur or extract. Contrary to the above, fromolybdenum-99 concentration was used to determine the	m August 1989 through	paring a technetium-99m oncentration in each eluate October 1990, the	
9			-
10			-
11	THE RESIDENCE OF THE PROPERTY	THE STREET COLUMN THE RESIDENCE OF CASES AND ADDRESS OF THE PARTY OF T	William British and British British
12.	APPENDENT OF THE SECTION ASSESSMENT OF THE SECTION SECTION ASSESSMENT ASSESSMENT OF THE SECTION		THE RESERVE OF THE PERSON NAMED IN
13	NOTE THE COMMUNICATION AND A COMMUNICATION OF THE PARTY O		
14.	THE PERSON NAMED OF THE PE		
15.	THE RELEASE OF THE PARTY OF THE		
18.			-
12			
14			A CONTRACTOR OF THE PARTY OF TH
19.			William to the season of the s
20.			
21			
2			
Z)			
24			
75			
76			
27			
29	******************************		and the state of t
CO.			
3.	estates as at a consideration of the consideration and a subsection of the consideration of t		THE RESERVE OF THE PERSONNEL PROPERTY OF
D	CONTRACTOR OF STREET, Make Street, STR	TO LIFE OF THE THE CONTROL SECTION AND THE CONTROL OF THE CONTROL	W. C. (1997)
A.			THE RESIDENCE PROPERTY OF THE PARTY OF
4	A POPEN CONTRACTOR CONTRACTOR OF THE STREET ASSESSMENT OF A STREET OF A STREET PROPERTY.	THE REPORT OF LAND WITHOUT ASSESSMENT ASSESSMENT ASSESSMENT OF THE PARTY OF THE PAR	
35	personal des en recentral de la companie de la comp		
36	The state of the s	ende en de en sous e et en misse and distribute plant misse en strong en subsentier an antique s'en la arte de dem	
33	The second secon	The State Control of the Control of State Act on the Control of the Act of the Control of the Co	
\	***************************************	The state of the s	*****
a			Contract to the last of the contract of the co