

NOV 4 1982

Docket No. 30-01315

License No. 08-01709-04

MEMORANDUM FOR: Daniel J. Holody, Enforcement Specialist, Enforcement and Investigation Staff, Region I

FROM: John D. Kinneman, Chief, Materials Program Section No. 1

SUBJECT: PROPOSED ENFORCEMENT ACTION - GEORGETOWN UNIVERSITY MEDICAL CENTER

Enclosed is a proposed enforcement letter for the subject licensee which includes a violation for failure to secure licensed material against unauthorized removal.

During the inspection, the inspectors went directly from the front door of the hospital to the Nuclear Medicine Department. They were able to enter the Department's "Hot Lab" where millicurie quantities of radiopharmaceuticals were stored, without being observed or challenged by employees in Nuclear Medicine, demonstrating that the licensee was not adequately controlling access to the licensed material stored there. However, the location of the Department within the hospital, the fact that actual radiation levels within the Department were low (less than 2 millirem per hour except for a bag of waste which measured 7 millirem per hour on contact with thin end window G-M survey meter), the half-life of most of the material was short (technetium-99m, 6 hours), and the fact that the licensed material was clearly labelled and not in an "attractive" form for theft lead us to conclude that the threat to the health and safety of the public was minimal and remote.

As of August 30, 1982, the licensee took corrective action by placing new locks on the laboratory, having a training session regarding security requirements for all personnel in the Department, establishing key control procedures and reviewing the need for an automatic door closer for the laboratory door. This leads us to conclude that classification of this violation in Severity Level IV is appropriate.

The licensee was last inspected on August 28-29, 1980; no violations were identified. Please give this matter your prompt attention.

Original Signed By:

JACK DAVIS

*for* John D. Kinneman, Chief  
Materials Program Section No. 1

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cc:  
J. Lieberman, IE  
D. Holody, RI

*JH* RI:DETP Johansen/lp 10/25/82  
*JK* RI:DETP Kinneman 11/2/82

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