

U.S. NUCLEAR REGULATORY COMMISSION

REGION V

30-14720

Report No. 82-02

License No 50-18244-01 Priority IV Category G

Licensee: Humana Hospital Alaska

Pouch 8-AH

Anchorage, Alaska 99508

Facility Name: Humana Hospital Alaska

Conference at: 2801 De Barr Road, Anchorage

Conference Conducted: October 25, 1982

Participants: *A. D. Johnson* 11/19/82  
A. D. Johnson, Director of Enforcement Date Signed

*H. E. Book* 11/19/82  
H. E. Book, Chief, Radiological Safety Br. Date Signed

Approved by: *R. D. Thomas* 11/19/82  
R. D. Thomas, Chief, Materials Radiation Date Signed  
Protection Section

Approved by: *G. S. Spencer* 11/19/82  
G. S. Spencer, Director, Division of Date Signed  
Radiological and Safeguards Programs

Summary:

An Enforcement Conference was held on October 25, 1982. The following matters were discussed:

1. Violations observed during last inspection at Humana Hospital.
2. NRC enforcement policies and procedures.
3. NRC actions to be take in present situation.
4. Possible future action by NRC.
5. Other matters of concern to NRC.

The Enforcement Conference involved a total of 3 manhours on site, utilizing two NRC representatives.

RV From 219 (1)

## DETAILS

### 1. Enforcement Conference Participants

Mary D. Willis, Associate Executive Director, Humana Hospital Alaska  
James D. Pister, M. D., Authorized User  
Randolph M. Hall, M. D., Authorized User  
Sid Heidersdorf, Radiological Physicist, State of Alaska  
Debbie Menow, Chief Technologist  
Tom Scott, Nuclear Medicine Technologist  
A. D. Johnson, Director of Enforcement, NRC  
H. E. Book, Chief, Radiological Safety Branch, NRC

### 2. Enforcement Conference

On October 25, 1982 an enforcement conference was held at Humana Hospital Alaska, 2801 De Barr Road, Anchorage, Alaska, with the individuals listed above participating. The enforcement conference was related to a routine safety inspection of activities authorized by NRC license number 50-18244-01. That inspection was conducted on September 16, 1982. The enforcement conference was announced in a letter dated October 6, 1982. A copy of that letter is attached to this report.

The violations observed during the most recent inspection were discussed by H. E. Book. The licensee had already received the Notice of Violation dated October 14, 1982. Appendix A of that Notice of Violation is attached to this report and was used in the discussions with the licensee. The licensee was told that a formal written response to the Notice of Violation was required. However, in most cases licensee representatives responded verbally as the violations were described.

Item A relates to leak tests of sealed sources. The licensee said there was some confusion about the Co-57 source because it was a screw top vial of solution. They were told that if an item was utilized for calibrations and treated as a sealed source (i.e. clean on the outside surfaces) it should be leak tested. The fact that Co-57 is accelerator produced and not regulated by the NRC was not discussed. Good radiation safety practices would still indicate periodic leak tests on that item. Leak tests were missed on the Am-241 source, but will be conducted in the future.

With respect to Item B, part 1, the licensee said a new chairman of the Radiation Safety Committee and a new Radiation Safety Officer had been appointed, and assured the NRC representatives that meetings and audits would be conducted as required. Regarding Item B, part 2, the licensee said the accuracy calibrations had been conducted annually, under the impression that annual frequency was acceptable, but they would be done each six months in the future. Item B, part 3, relates to frequency of surveys. The licensee representatives assured the NRC representatives that surveys would be conducted at the required frequency.

Item B, part 4, describes a violation for not performing consistency checks of the dose calibrator on a daily basis. Four days missed are listed as examples. The licensee said they had reviewed the records and those 4 days were the only days missed, and noted that on one of the days the department had been closed because of a holiday, and one other day the department had been closed for equipment maintenance. Therefore, they noted that they had missed only two daily checks since the last inspection in 1979, but that the tests would be conducted on a daily basis in the future.

With respect to Item B, parts 5 and 6, licensee representatives stated that instruments would be calibrated at the required frequency, and that specified training had been conducted since the inspection, and would be conducted annually hereafter. Regarding Item B, part 7, licensee representatives said the required survey records had been made, but had been mistakenly destroyed. They said in the future, the records would be maintained. They also said the records of disposal referenced in Item C would be maintained in the future.

The current General Policy and Procedures for NRC Enforcement Actions as published in Appendix C of 10 CFR Part 2 were explained by A. D. Johnson. Copies of that document were distributed to licensee representatives. In his explanation, Mr. Johnson specifically discussed escalated enforcement actions such as civil penalties, orders to modify, suspend, or revoke licenses, and orders to cease and desist. The relative significance of the different severity levels was explained. It was pointed out that the violations in this case were Severity Level IV and V, and were categorized in Supplement VI of the NRC Policy. It was clearly pointed out by Mr. Johnson that this was an Enforcement Conference, and the significance of such a meeting was explained. The licensee was told that no escalated enforcement action was planned in this case.

It was also explained by Mr. Johnson that when a violation is not corrected satisfactorily, if it is repeated, or if a similar violation occurs, escalated enforcement action would probably be taken by the NRC. The licensee was informed that this provision would remain in effect for two years or until the next inspection, whichever was longer. The licensee was also informed that an early reinspection would be conducted by the NRC.

Mr. Book explained that there was some concern in NRC since the last inspection in 1979 had revealed no violations. Then the current inspection, with the hospital under new management, revealed numerous violations. The hope was expressed that the enforcement conference would give them a better understanding of our procedures, our requirements and our concerns, and would result in an improved program.

Regarding violation Item C, Mr. Book suggested that the hospital may want to look into the possibility of utilizing the general license authorized by 10 CFR 31.11 for in-vitro use of material in the R.I.A. lab, and gave the licensee appropriate information concerning such use.

3. Conclusion

The licensee's response to the enforcement conference was acceptable. The NRC will receive a written response to the Notice of Violation. No escalated enforcement action is contemplated at this time. Information gathered during the enforcement conference indicates that some of the violations were not as serious or as significant as was originally believed.