APPENDIX A

NOTICE OF VIOLATION

Stamford Hospital
Stamford, Connecticut 06904

Docket No. 030-01265
License No. 06-06697-02

As a result of the inspection conducted on January 23, 1991, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1990), the following violations were identified:

A. 10 CFR 35.50(a)(2) requires, in part, that a medical use licensee test each dose calibrator for accuracy at least annually.

Contrary to the above, as of January 23, 1991, the dose calibrator was not tested for accuracy since December 18, 1989.

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

B. 10 CFR 35.53(a) requires, in part, that licensees measure the activity of each radiopharmaceutical dosage before medical use.

Contrary to the above, as of January 23, 1991, the licensee did not measure the activity of each radiopharmaceutical dosage before medical use. Specifically, the licensee used the activity recorded on unit doses measured by the radiopharmaceutical supplier and administered them to patients without performing the required activity measurements.

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

C. 10 CFR 35.60(c) requires, in part, that each individual use a syringe radiation shield when administering a radiopharmaceutical by injection.

Contrary to the above, on January 23, 1991, the nuclear medicine technologist did not use a syringe radiation shield when administering a radiopharmaceutical by injection.

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

D. 10 CFR 35.21(b)(2)(v) requires the Radiation Safety Officer to establish, collect in one binder or file, and implement written policy and procedures for using byproduct material safely.

The Radiation Safety Officer established the procedure contained in Appendix I of Regulatory Guide 10.8, revision 2, "Model Rules for Safe Use of Radiopharmaceuticals."

Step 8 of Appendix I of Regulatory Guide 10.8 requires individuals to wear a finger exposure monitor during the preparation, assay, and injection of radiopharmaceuticals.

Contrary to the above, as of January 23, 1991, a nuclear medicine technologist did not wear a finger exposure monitor during the preparation, assay, and injection of radiopharmaceuticals. Further, a review of film badge records indicated that the nuclear medicine technologist did not wear a finger exposure monitor for the period December, 1989 through December, 1990.

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

E. 10 CFR 35.51(h) requires a licensee in possession of a sealed source or brachytherapy source to measure the ambient dose rates quarterly in all areas where such sources are stored.

Contrary to the above, as of January 23, 1991, the licensee did not measure the ambient dose rates quarterly in all areas where such sources (i.e., sealed source or brachytherapy source) were stored. Specifically, the dose rates in the brachytherapy source storage area were not measured quarterly, as required.

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

Pursuant to the provisions of 10 CFR 2.201, Stamford Hospital is hereby required to submit to this office within thirty days of the date of the letter which transmitted 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 violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.