

APPENDIX A

NOTICE OF VIOLATION

Eugene Cohen, M.D. & Associates
Philadelphia, Pennsylvania 19134

Docket No. 030-22079
License No. 37-20792-01

As a result of the inspection conducted on December 14, 1990, 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. Condition 14 of License No. 37-20792-01 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in the application dated November 19, 1984, and the letter dated January 4, 1985.

1. Item 10 of the application dated November 19, 1984, requires that the dose calibrator be calibrated in accordance with Appendix D to Regulatory Guide 10.8, Revision 1.

Appendix D to Regulatory Guide 10.8, Revision 1 requires that dose calibrator linearity be determined at installation and quarterly thereafter.

Contrary to the above, from April, 1988 to November, 1989, an interval that exceeds a quarter, dose calibrator linearity had not been determined.

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

2. Item 15 of the application dated November 19, 1984, requires that the general rules for safe use of radioactive material that appear in Appendix G to Regulatory Guide 10.8, Revision 1 be followed.

Appendix G to Regulatory Guide 10.8, Revision 1 requires that individuals wear personnel monitoring devices at all times while in areas where radioactive materials are used or stored.

Contrary to the above, as of December 14, 1990, an individual did not wear a personnel monitoring device while working in an area where radioactive materials were used and store.

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

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- B. 10 CFR 19.12 requires that all individuals working in a restricted area be instructed in the precautions and procedures to minimize exposure to radioactive materials, in the purpose and functions of protective devices employed, and in the applicable provisions of the Commission's regulations and licenses.

Contrary to the above, as of December 14, 1990, an individual who worked in the hot lab, a restricted area, had not been instructed in precautions and procedures to minimize exposure to radioactive materials, in the purpose and functions of protective devices, and in the applicable provisions of the Commission's regulations and licenses.

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

Pursuant to the provisions of 10 CFR 2.201, Eugene Cohen, M.D. & Associates 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.