

Docket No. 30-3146

DEC 6 1982

License No. 37-11658-01

West Park Hospital  
ATTN: Mr. Martin Radiwell  
Executive Director  
Ford Road and Fairmount Park  
Philadelphia, Pennsylvania 19131

Gentlemen:

Subject: Inspection No. 30-3146/82-01

This refers to the routine safety inspection conducted by Mrs. Teresa Hall Darden of this office on October 15, 1982, of activities authorized by NRC License No. 37-11658-01 and to the discussions of our findings held by Mrs. Darden with Mr. Joseph DiCampi and Dr. Joseph Rosen of your staff at the conclusion of the inspection.

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

Our inspector also verified the steps you have taken to correct the violations brought to your attention in the enclosure to our letter dated April 25, 1980. We have no further questions regarding the steps you took to correct item A. With regard to items B and C, these items have recurred.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These violations have been categorized by severity level in accordance with the NRC Enforcement policy (10 CFR 2, Appendix C) published in the Federal Register Notice (47 FR 9987) dated March 9, 1982. You are required to respond to this letter; and, in preparing your response, you should follow the instructions in Appendix A.

Items C and D.1 in the Notice of Violation enclosed with this letter were identified during a previous inspection of your licensed activities on April 1, 1980, were documented in the enclosure to our letter dated April 25, 1980. Your letter to this office dated May 6, 1980, stated that all material suspected of being contaminated with licensed materials would be bagged and returned to the Nuclear Pharmacy or decayed to background levels and disposed of to the normal trash and that instrument linearity would be performed on the dose calibrator quarterly. From our October 15, 1982 inspection, it appears that the stated corrective actions were not effective since these items have

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recurred. Recurrent and uncorrected violations are given additional weight in the consideration and selection of appropriate enforcement action. Therefore, in your response to this letter, you should give particular attention to those actions taken or planned to ensure that identified items of noncompliance will be completely corrected and will not recur.

From the discussion at the conclusion of the inspection, it is our understanding that you plan to initiate additional management controls to insure compliance with NRC regulations, including considering the use of a consultant to regularly audit your licensed program, provide workers with required training in NRC regulations and your specific license conditions, and provide instrument preventive maintenance.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

Your cooperation with us in this matter is appreciated.

Sincerely,

**Original Signed By:  
John D. Kinneman**

*for*

Thomas T. Martin, Director  
Division of Engineering and Technical  
Programs

Enclosure: Appendix A, Notice of Violation

cc w/encl:  
Public Document Room (PDR)  
Nuclear Safety Information Center (NSIC)  
Commonwealth of Pennsylvania

bcc w/encl:  
Region I Docket Room (with concurrences)  
Senior Operations Officer

*[Handwritten signature]*  
RI:DETP  
Darden/wb  
11/29/82

*[Handwritten signature]*  
RI:DETP  
Kinneman  
12/1/82

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