

APPENDIX A
NOTICE OF VIOLATION

St. Agnes Medical Center
Philadelphia, Pennsylvania 19145

Docket No. 030-03196
License No. 37-13651-01

As a result of the inspection conducted on January 8-9, 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 35.13(c) requires, in part, that a licensee apply for and receive a license amendment before it changes Radiation Safety Officers.

Contrary to the above, as of January 9, 1991, the licensee had not applied for nor received a license amendment prior to changing Radiation Safety Officers. Specifically, from June, 1990 to January 9, 1991, individuals serving as Radiation Safety Officer were appointed by the licensee without the required license amendment.

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

- B. Condition 15 of License No. 37-13651-01 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in an application dated December 31, 1985 and letters dated September 19, 1986, October 31, 1986, October 24, 1988, January 18, 1989, March 7, 1989, July 14, 1989, July 19, 1989, December 4, 1989, and March 5, 1990.

1. The application dated December 31, 1985 requires that radioactive material be used in accordance with procedures contained in Item No. 15, 'Laboratory Rules For the Use of Radioactive Materials'.

- a. Procedure No. 6 of Item No. 15 requires that each patient dose be assayed in the dose calibrator prior to administration and that no doses that differ from the prescribed dose by more than 10 percent be administered.

Contrary to the above, during September, 1990, doses on several different occasions were administered that differed from the prescribed dose by more than 10 percent.

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

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- b. Procedure No. 8 of Item No. 15 requires that TLD finger badges be worn during preparation, assay, and injection of radiopharmaceuticals.

Contrary to the above, from June, 1989 to September 1989, a nuclear medicine technologist did not wear a TLD finger badge during preparation and assay of radiopharmaceuticals.

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

2. Item No. 24 of the application dated December 31, 1985 requires that all personnel who routinely handle radioactive material be provided a film or TLD whole body monitor.

Contrary to the above, on several occasions, the licensee failed to provide temporary technicians, who routinely handled radioactive material, a film or TLD whole body monitor.

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

Pursuant to the provisions of 10 CFR 2.201, St. Agnes Medical Center 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.