

Appendix

NOTICE OF VIOLATION

Bronson Methodist Hospital

License No. 21-13125-01

As a result of the inspection conducted on December 1, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. License Condition No. 17 states that the results of surveys performed prior to release of patients treated with cesium-137 implants shall be recorded and maintained for inspection.

Contrary to the above, records of surveys performed on these patients were not recorded and maintained on at least three occasions in August and October 1981.

This is a Severity Level V violation (Supplement VII).

2. 10 CFR 35.14 requires that sealed calibration or reference sources possessed pursuant to 10 CFR 35.14(e) be tested for leakage and/or contamination at intervals not to exceed six months.

Contrary to this requirement, your 279 microcurie barium-133 and 224 microcurie cesium-137 sealed calibration sources were not leak tested from their dates of receipt in May 1977, and June 1977, respectively, to February 10, 1981, or from February 10, 1981, to the date of this inspection. These periods exceed six months.

This is a Severity Level V violation (Supplement VII).

3. License Condition No. 19 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in certain referenced applications and letters.

The referenced application dated January 27, 1979, states in Item No. 14 that procedures for opening radioactive material packages found in Appendix F of NUREG-0338, November 1, 1977, will be followed. Appendix F states that packages will be surveyed at three feet and the surface, upon receipt.

Contrary to the above, packages containing radioactivity have not been surveyed on receipt. Specifically, a package containing cesium-137 received on October 6, 1981, and packages containing iridium-192 received on October 20, 1981, and another on November 5, 1981, were not surveyed.

This is a Severity Level V violation (Supplement VII).

4. License Condition No. 19 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in certain referenced applications and letters.

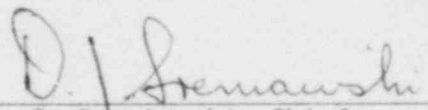
The referenced application dated January 27, 1979, states in Item No. 17 that area survey procedures contained in Appendix I of NUREG-0338, November 1, 1977, will be followed. Appendix I states that all elution, preparation and injection areas will be surveyed daily with a G-M survey meter and that all other laboratory areas will be surveyed weekly with a G-M survey meter and a series of wipe tests.

Contrary to the above, elution, preparation and injection areas have not been surveyed daily since the requirement began in May 1979. In addition, wipe tests have not been performed weekly in all other laboratory areas since the requirement began in May 1979.

This is a Severity Level V violation (Supplement VII).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

Dated 12/15/81

  
D. J. Sreniawski, Chief  
Materials Radiation Protection  
Section 2