Appendix

NOTICE OF VIOLATION

Rockford Memorial Hospital License No. 12-02530-03

As a result of the inspection conducted on September 27-30, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 20.105(b) requires that radiation levels in unrestricted areas be limited so that if an individual were continuously present in the area, he could not receive a dose in excess of 2 millirems in any hour or 100 millirems in any seven consecutive days.

   Contrary to this requirement, on April 22-24 and October 27-31, 1981, radiation levels existed of such a magnitude that if an individual had been continuously present in the area, he could have received a dose in excess of 2 millirems in any one hour and 100 millirems in any seven consecutive days. Specifically, on April 22-24, 1981, the radiation levels in an unrestricted area of the hallway on the fourth floor were 6 millirems per hour for approximately 36 hours and could have resulted in a dose of 216 millirems. On October 27-31, 1981, the radiation levels in an unrestricted area of the hallway on the fourth floor were 2.8 millirems per hour for approximately 49 hours and could have resulted in a dose of 137 millirems.

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

2. License Condition No. 19 requires that all licensed material be possessed and used in accordance with statements, representations and procedures contained in application dated March 29, 1979; letters dated May 21, 1979, December 4 (with attachment) and December 22, 1980, July 6 and November 6, 1981, August 12, 1982; and ALARA Program dated August 15, 1980.

   The letter dated December 4, 1980, states that the procedures described in Section 2 of Appendix D (NRC Medical Regulatory Guide) shall be followed for calibration of the dose calibrator. Section 2 of Appendix D states that linearity checks shall be performed using the maximum activity to be assayed. Geometrical variation checks shall be performed after repair or adjustment of the dose calibrator.

   Contrary to these requirements, linearity checks were not performed using the maximum activity to be assayed. Specifically, linearity checks were performed using 30 millicuries (maximum dose) rather than the maximum activity (the first elution of the generator which is approximately 700 millicuries). A geometrical variation check of the

dose calibrator was not performed after a new chamber was installed in the dose calibrator on April 13, 1982.

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

3. 10 CFR 71.5(a) requires that no licensee shall transport any licensed material outside of the confines of his plant or other place of use unless the licensee complies with the applicable regulations of the Department of Transportation in 49 CFR Parts 170-189.

49 CFR 173.393(h) states that no significant removable radioactive contamination shall be on the external surface of packages.

Contrary to this requirement, it was learned through statements of licensee representatives and a review of records that wipe tests were not performed to ensure that no removable radioactive contamination was present on packages shipped from your hospital. Specifically, wipe tests were not performed on packages containing 21 spent generators shipped from your hospital on March 18, 1982, and packages containing 18 spent generators shipped from your hospital on July 30, 1982. Wipe tests were not performed on packages containing iridium-192 seeds shipped from your hospital on May 18, July 6, August 24, October 2 and November 4, 1981.

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

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. Consideration may be given to extending your response time for good cause shown.

10-13-82
Dated

D. G. Wiedeman, Chief
Materials Radiation Protection
Section 1