

APPENDIX

NOTICE OF VIOLATION

Department of the Air Force  
Brooks AFB, Texas

Docket No. 30-28641/90-14  
License No. 42-23539-01AF

During an NRC inspection conducted on September 20-21, 1990, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), (Enforcement Policy), the violations are listed below:

1. 10 CFR 35.51(a) requires each licensee to calibrate the survey instruments used to show compliance with this part before first use, annually, and following repair.

Contrary to the above requirement, uncalibrated survey instruments were used for daily and weekly area radiation surveys from June 1990 to the time of the inspection, September 20-21, 1990. Specifically, at the time of this inspection, weekly area surveys of the waste storage room and daily area surveys were performed with Ludlum, Model 12 (Serial No. 22728) and Eberline, Model E-520 (Serial No. 274) survey instruments that had been last calibrated on June 19, 1989, and that had been due again for calibration on June 19, 1990.

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

2. 10 CFR 35.50(b)(3) requires that each dose calibrator be tested for linearity upon installation and at least quarterly thereafter.

Contrary to the above requirement, the Capintec dose calibrator had been tested for linearity on January 20, 1990, and again on July 2, 1990. This period exceeds the quarterly testing requirement.

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

3. 10 CFR 35.315(a)(8) requires a measurement of the thyroid burden of each individual who helped prepare or administer a therapy dosage of iodine-131 within 3 days after administering the dosage.

Contrary to the above requirement, on April 3, 1990, a dose of 106 millicuries of iodine-131 was administered and the individual who prepared and administered the dose did not receive a thyroid burden measurement within 3 days.

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

4. 10 CFR 35.315(a)(4) states that promptly after administration of a therapy dose, the licensee shall measure the dose rates in contiguous restricted and unrestricted areas with a radiation measurement survey instrument to demonstrate compliance with the requirements of Part 20.

Contrary to the above requirement, on July 9, 1990, unrestricted areas around the room of a patient who had received a dose of 143 millicuries of iodine-131 were not surveyed to demonstrate compliance with Part 20.

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

5. 10 CFR 35.59(g) states that a licensee in possession of a sealed source shall conduct a quarterly physical inventory of all such sources in its possession.

Contrary to the above requirement, the last physical inventory of sealed sources was conducted in February 1989.

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

Pursuant to the provisions of 10 CFR 2.201, the Department of the Air Force is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this 24th day of January 1991