APPENDIX A

NOTICE OF VIOLATION

Greentree Radiology Associates
Marlton, New Jersey 08053

Docket No. 030-22090
License No. 29-20798-01

As a result of the inspection conducted on January 31, 1991 and February 6, 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 35.70(e) requires that licensees survey for removable contamination once each week all areas where radiopharmaceuticals are routinely prepared for use, administered, or stored.

Contrary to the above, as of January 31, 1991, surveys for removable contamination were not being performed once each week in all areas where radiopharmaceuticals were routinely prepared for use, administered, or stored. Specifically, wipe tests were not performed of the hot lab and injection area.

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

B. 10 CFR 19.12, in part, requires that all individuals working in a restricted area be instructed in the applicable provisions of the Commission's regulations and licenses.

Contrary to the above, as of January 31, 1991, an individual who was working in the Nuclear Medicine Laboratory, a restricted area, had not been instructed in the applicable provisions of the Commission's regulations and the licenses. Specifically, the nuclear medicine technologist was not instructed in the regulations in 10 CFR 35 regarding requirements for performing contamination surveys of laboratory areas, reporting of misadministrations to the Nuclear Regulatory Commission, and conducting physical inventories of sealed sources. In addition, the technologist was not instructed in the correct procedure for performing checks of each survey meter with a dedicated check source on each day of use in accordance with the regulatory requirements of 10 CFR 35.51.

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

C. 10 CFR 35.33(c) requires, in part, that the licensee notify the appropriate NRC Office in writing on Form NRC 473 within 15 days if a misadministration involved the use of byproduct material such that the patient is likely to receive an organ dose greater than 2 rem or a whole body dose greater than 500 millirem.

Contrary to the above, as of January 31, 1991, the licensee did not notify the appropriate NRC Office in writing on Form NRC 473 within 15 days of a misadministration which occurred on August 3, 1988 for which the patient was estimated to receive an organ dose greater than 2 rem.

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

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

Contrary to the above, the licensee failed to conduct a quarterly physical inventory of all sealed sources in its possession. Specifically, quarterly physical inventories of sealed sources were not conducted from January 1, 1988 to October 31, 1990 and an inventory conducted in November, 1990 was not complete in that it did not include a gadolinium-153 source in the licensee's possession.

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

E. 10 CFR 30.51(a) requires that each person who receives byproduct material pursuant to a license issued pursuant to the regulations in 10 CFR 35 shall keep records showing the receipt of such byproduct material.

Contrary to the above, records of receipt of byproduct material were not maintained. Specifically, no record of receipt of a gadolinium-153 source received by the licensee in 1990 was available at the time of the inspection.

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

Pursuant to the provisions of 10 CFR 2.201, Greentree Radiology Associates 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.