ENCLOSURE

NOTICE OF VIOLATION

St. Luke's Hospital
Richmond, Virginia

Docket No. 030-11338
License No. 45-16618-01

During an NRC inspection conducted on April 19, 1991, 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), the violations are listed below:

A. Condition 17 of NRC License No. 45-16618-01 dated October 15, 1987, requires that licensed material be used and possessed in accordance with the statements, representations and procedures described in the license application dated June 30, 1980, and in the documents submitted in support of that application.

1. Items 1(b) and 3(a)(1) of the ALARA program attached to the licensee letter dated October 2, 1987, requires the licensee's management and Radiation Safety Officer (RSO) to perform a formal annual review of the radiation safety program to include ALARA (as low as reasonably achievable) considerations.

Contrary to the above, the licensee's management and RSO did not perform a formal annual review of the radiation safety program to include ALARA considerations for the year 1990.

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

2. Item 3(a)(3) of the ALARA program attached to the licensee letter dated October 2, 1987, requires the RSO to perform semiannual reviews of radiation level survey records.

Contrary to the above, between November 3, 1988 and April 19, 1991, the RSO did not perform semiannual reviews of radiation level survey records.

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

B. 10 CFR 35.70(a) requires a licensee to survey with a radiation detection survey instrument at the end of each day of use all areas where radiopharmaceuticals are routinely prepared for use or administered.

Contrary to the above, between November 3, 1988 and April 19, 1991, the licensee did not survey with a radiation detection survey instrument at the end of each day of use areas where radiopharmaceuticals were prepared

for use or administered. Specifically, on 11 occasions when nuclear medicine procedures were performed on weekends, the surveys were not conducted.

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

C. 10 CFR 35.51(b)(1) requires a licensee to check each dose calibrator for constancy with a dedicated check source at the beginning of each day of use on a frequently used setting.

Contrary to the above, between November 3, 1988 and April 19, 1991, the licensee did not check the dose calibrator for constancy with a dedicated check source at the beginning of each day of use. Specifically, on five (5) occasions when nuclear medicine procedures were performed on weekends, the constancy checks were not conducted; and the licensee did not check the dose calibrator for constancy with a dedicated check source at the beginning of each day of use on a frequently used setting. Specifically, the setting most frequently used by the licensee was technetium-99m. However, the licensee was performing the daily constancy check on the cobalt-57 setting.

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

Pursuant to the provisions of 10 CFR 2.201, St. Luke's Hospital is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include [for each violation]: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

William E. Cline, Chief
Nuclear Materials Safety and
Safeguards Branch
Division of Radiation Safety
and Safeguards

Dated at Atlanta, Georgia
this 15th day of May 1991