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APPENDIX A

NOTICE OF VIOLATION

Sacred Heart Hospital
Norristown, Pennsylvania 19401

Docket No. 030-02989
License No. 37-01563-03

As a result of the inspection conducted on August 23 and September 15, 1983, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 20.207(a) requires that licensed materials stored in an unrestricted area be secured against unauthorized removal from the place of storage. 10 CFR 20.207(b) requires that materials not in storage be under constant surveillance and immediate control of the licensee. As defined in 10 CFR 20.3(a)(17), an unrestricted area is any area access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

Contrary to the above, on August 23, 1983, licensed material was stored in the unlocked (thereby creating an unrestricted area) Nuclear Medicine hot laboratory and scan room and was neither under constant surveillance nor immediate control.

This is Severity Level IV violation (Supplement IV).

- B. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, as of September 15, 1983, inadequate surveys (evaluations) were made to assure compliance with 10 CFR 20.101, a regulation which limits the radiation dose to the extremities of individuals in restricted areas. Specifically, no evaluation was made of the dose to the extremities of technologists who routinely prepare and administer licensed material and whose TLD finger badges were not returned for processing in December 1981 and December 1982.

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

- C. Condition 16 of License No. 37-01563-03 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated July 21, 1978.

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1. Item 17 of this application requires that surveys be performed in accordance with the "Area Survey Procedures" contained in Appendix G of the Regulatory Guide.

Appendix G requires daily surveys of all preparation and injection areas.

Contrary to the above, as of September 15, 1983, preparation and injection areas were not surveyed daily.

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

2. Item 11 of this application describes the facilities where licensed materials are used and stored.

Contrary to the above, as of September 15, 1983, licensed materials were stored and used in facilities other than those described in the application.

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

Pursuant to the provisions of 10 CFR 2.201, Sacred Heart Hospital 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.