

NOTICE OF VIOLATION

Columbia Hospital
Milwaukee, Wisconsin

License No. 48-02417-01
Docket No. 030-03429

During an NRC inspection conducted on March 13, 1992, 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 (1991), the violations are listed below:

1. 10 CFR 35.21(a) requires that the licensee, through the Radiation Safety Officer, ensure that radiation safety activities are being performed in accordance with approved procedures. The licensee's procedures for nuclear medicine and ancillary staff training are described in the letter dated July 10, 1990, and were approved by License Condition No. 14, Amendment No. 39.

The letter dated July 10, 1990 states in Item No. 2 and Attachment 8.1 that ancillary staff personnel will be instructed in appropriate radiation safety procedures and the licensee's in-house work rules. The instruction will be provided before assuming duties with, or in the vicinity of, radioactive materials and whenever there is a significant change in duties, regulations or the terms of the license.

Contrary to the above, certain members of the ancillary staff who occasionally handle radioactive material packages were not instructed in the licensee's radioactive material package receipt and distribution procedures prior to assuming such duties. Specifically, on October 2, 1989, distribution clerks accepted and delivered a package containing approximately 439 millicuries of cesium-137 and were not instructed in package receipt and distribution procedures until at least October 3, 1991. Similarly, as of March 13, 1992, two recently hired distribution clerks that occasionally handle packages containing radioactive material, were reportedly not instructed in package receipt procedures.

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

2. 10 CFR 35.21(a) requires that the licensee, through the Radiation Safety Officer, ensure that radiation safety activities are being performed in accordance with approved procedures. The licensee's procedures for opening packages containing radioactive material are described in the application dated May 22, 1990, and were approved by License Condition No. 14, Amendment No. 39.

The application dated May 22, 1990, states in Item 10.7, "Opening Packages Containing Radioactive Material," that the model guidance for opening packages that was published in Appendix L to Regulatory Guide 10.8, Revision 2, will be established and implemented. Appendix L requires that exposure rates be measured at one meter from the package and at its surface.

Contrary to the above, package surface exposure rates on packages containing 489 and 130 millicuries of cesium-137 and received on October 2, 1991 and December 6, 1991, respectively, were not measured.

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

Pursuant to the provisions of 10 CFR 2.201, Columbia Hospital is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, Illinois, 60137, 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.

MAR 26 1992

Dated _____

William H. Schultz /sor
John A. Grobe, Chief
Nuclear Materials Safety Branch