

APPENDIX A

NOTICE OF VIOLATIONS

V. A. Medical Center
7th Street and Indian School Road
Phoenix, Arizona 85012

License No. 02-10072-01

During an NRC inspection conducted on February 1, 1988, certain violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. License Condition 19 states, in part, that except as specifically provided otherwise by this license, the licensee shall possess and use licensed material in accordance with statements, representations and procedures contained in letter dated June 16, 1986. The institutional ALARA program was incorporated in the letter dated June 16, 1986. The ALARA program requires an annual audit by management.

Contrary to the above requirement, at the time of the inspection, the licensee management had not conducted a formal annual review of the radiation safety program as required since the last inspection conducted on March 3 and 4, 1986.

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

- B. License Condition 19 states, in part, that except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with statements, representations and procedures contained in the application dated August 27, 1978 which incorporated Reg. Guide 10.8, Appendix I by reference. Appendix I states in part that eating, drinking, smoking or applying cosmetics in any area where radioactive material is stored or used should not be permitted.

Contrary to the above requirement, on the date of the inspection a licensee employee was observed by the inspector to be drinking coffee in the RIA laboratory in full view of a sign prohibiting such activity.

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

- C. 10 CFR 30.51(a) states, in part, that each person who receives byproduct material under a license issued pursuant to the regulations in this part shall keep records showing the receipt, transfer and disposal of such byproduct material.

1. Contrary to the above requirement, at the time of the inspection, records of disposal of used syringes containing licensed material were not maintained since the last inspection conducted on March 3 and 4, 1986.
2. Contrary to the above requirement, at the time of the inspection, records of disposal into the sanitary sewer from the RIA laboratory

were not maintained since the last inspection conducted on March 3 and 4, 1986.

The above two items constitute a Severity Level V violation (Supplement VI).

- D. 10 CFR 19.11(a) states that each licensee shall post current copies of the following documents: (1) 10 CFR 19 and 10 CFR 20; (2) the license, license conditions, or documents incorporated into a license by reference, and amendments thereto; and (3) the operating procedures applicable to licensed activities. 10 CFR 19.11(b) also states that if posting of a document specified in paragraph (a)(1), (2) or (3) of this section is not practicable, the licensee may post a notice which describes the document and states where it may be examined.

Contrary to the above requirements, at the time of the inspection, the above documents were neither posted nor was there a notice in the RIA laboratory which describes the documents and states where they may be examined.

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

Pursuant to the provisions of 10 CFR 2.201, V. A. Medical Center, Phoenix, Arizona is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V with 30 days of the date of the letter transmitting this 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 if admitted, (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. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

James L. Montgomery
James L. Montgomery, Chief
Nuclear Materials Safety and
Safeguards Branch

Dated at Walnut Creek, California
this 20 day of February, 1988