

APPENDIX
NOTICE OF VIOLATION

Prairie Lakes Health Care Systems, Inc.
Watertown, South Dakota

Docket: 30-11624
License: 40-16775-01

During an NRC inspection conducted on February 24, 1988, 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 (1987), the violations are listed below:

1. Condition 13 of License No. 40-16775-01 requires that the licensee adhere to the licensee's statements and representations dated September 15, 1980, September 16, 1980, January 20, 1981, undated but received on November 4, 1986, January 16, 1987, and March 25, 1987.

- a. The attachment to the licensee's letter received on November 4, 1986, requires the licensee's Radiation Safety Committee (RSC) hold quarterly meetings pertaining to the licensee's program.

Contrary to the above, the licensee did not hold any RSC meetings for the period June 1983 to June 1986. This is a repeat violation.

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

- b. The attachment to the licensee's letter received on November 4, 1986, requires the RSC to perform an annual review of the licensee's nuclear medicine program.

Contrary to the above, the RSC did not perform an annual review of the nuclear medicine program for the years 1984, 1985, and 1987. This is a repeat violation.

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

- c. The attachment to the licensee's letter received on November 4, 1986, requires the licensee present monthly training on radiation safety, biological effects of radiation, radiopharmaceuticals, imaging procedures, instrumentation, and other aspects of nuclear medicine performed by the radiologists.

Contrary to the above, the licensee did not perform the required training for the period June 1983 to February 1988.

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

- d. The attachment to the licensee's letter received on November 4, 1986, requires the daily constancy checks of the dose calibrator to be performed in accordance to Section 2 of Appendix D of Regulatory Guide 10.8, Revision 1, October 1980. Section 2 requires that for

each source, plot net activity versus the day of the year on semilog graph paper and indicate that predicted activity of each source based on decay calculations and the ± 5 percent limits on the graph.

Contrary to the above, the licensee did not for this inspection period, June 6, 1983, through February 24, 1988, plot the net activity for the Cs-137 source versus the day of the year on semilog graph paper to readily determine if the measured activity variations were within ± 5 percent of the predicated activity.

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

- e. The attachment to the licensee's letter received on November 4, 1986, requires that the dose calibrator to be calibrated/accuracy tested annually in accordance with Section 2 of Appendix D of Regulatory Guide 10.8, Revision 1, dated October 1980.

Contrary to the above, the licensee did not calibrate the dose calibrator for the years 1984 and 1986.

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

2. 10 CFR 19.12 requires, in part, that licensee personnel working in or frequenting any portion of a restricted area be instructed in health protection problems associated with exposure to radioactive materials or radiation, and be instructed regarding protective devices, applicable regulations and license conditions, and the responsibility for reporting unusual occurrences, malfunctions, unnecessary exposures, etc.

Contrary to the above, the licensee did not perform such training in accordance with 10 CFR 19.12 from June 1983 to February 1988.

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

Pursuant to the provisions of 10 CFR 2.201, Prairie Lakes Health Care Systems, Inc. is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 22nd day of March 1988.