

APPENDIX
NOTICE OF VIOLATION

Radiology and Nuclear Medicine, Inc.
Tulsa, Oklahoma

Docket: 30-20594
License: 35-12120-02

During an NRC inspection conducted on April 14, 1986, 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 (1985), the violations are listed below:

1. License Condition 16 requires, in part, that licensed activities be conducted in accordance with statements, representations, and procedures contained in application dated May 20, 1983, and letters dated October 27, 1983, May 15, 1985, May 31, 1985, and December 9, 1985.

- a. Item 17 of the license application specifies that Appendix I of Regulatory Guide (RG) 10.8 will be adhered too concerning area surveys. RG 10.8 requires, in part, that a permanent record be kept of all survey results.

Contrary to this requirement, the licensee had not properly maintained area survey records.

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

- b. Item 24 of the license application specifies the type of personnel dosimetry required and the exchange frequency.

Contrary to this requirement, the Radiation Safety Officer and the Nuclear Medicine Technologist had not been given personnel monitoring devices by the licensee. These personnel were utilizing personnel dosimetry issued by another licensee for whom they also performed nuclear medical tasks.

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

- c. Item 10 of the license application requires, in part, the performance of the dose calibrator quarterly linearity test, annual accuracy test, and the daily constancy check in accordance with RG 10.8, Appendix D.

Contrary to this requirement, the licensee did not perform the dose calibrator quarterly linearity tests; did not perform the dose calibrator annual accuracy tests; and did not use the correct procedure in performing the dose calibrator daily constancy check which required the plotting of a graph to determine if the activity was within ± 5 percent of the standard value.

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

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- d. Item 10 of the license application requires, in part, that the survey instrument be operable and be calibrated in accordance with RG 10.8, Appendix D.

Contrary to these requirements, the licensee did not perform any survey meter calibrations and the NRC inspector determined the survey meter to be inoperable on the date of inspection, April 14, 1986.

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

2. 10 CFR 19.11 requires, in part, that each licensee shall post NRC Form 3 and current copies of specified regulations, license, or a notice specifying where such documents may be examined.

Contrary to these requirements, the licensee did not have any of these documents posted.

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

3. 10 CFR 20.205(d) requires, in part, that each licensee establish and maintain procedures for safety opening packages in which licensed material is received.

Contrary to this requirement, at the time of inspection no procedures for safety opening of packages routinely received were available for inspection.

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

4. 10 CFR 35.14(e) requires, in part, that sealed calibration or reference sources containing more than 100 microcuries of licensed material be tested for leakage and/or contamination at intervals not to exceed 6 months.

Contrary to this requirement, a 5 millicurie cesium-137 sealed calibration source had not been leak tested during the period January 1984 to April 1986.

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

5. 10 CFR 35.14(f)(2) requires, in part, that records of the quarterly physical inventory of calibration sources shall be maintained by the licensee for inspection by the Commission.

Contrary to this requirement, no quarterly inventory records were available for review by the NRC inspector.

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

Pursuant to the provisions of 10 CFR 2.201, Radiology and Nuclear Medicine, 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 violations 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 4th day of *June*, 1986.