

APPENDIX A

NOTICE OF VIOLATION

Springfield Medical Imaging Center
Springfield, Pennsylvania 19064

Docket No. 030-28820
License No. 37-20891-01

As a result of the inspection conducted on April 22, 1986, 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 purpose of protection of individuals from exposure to radiation and radioactive materials.

Contrary to the above, as of April 22, 1986, the Nuclear Medicine Laboratory, which contained millicurie quantities of licensed material, was occasionally unlocked when it was not under constant surveillance and immediate control. In addition, a case which contained material being returned to the nuclear pharmacy was left in a hallway by an outside entrance to the facility which was not under constant surveillance nor immediate control.

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

- B. 10 CFR 35.14(e)(1)(i) requires that each sealed source containing byproduct material be tested for leakage and/or contamination at intervals not to exceed six months.

Contrary to the above, as of April 22, 1986 a calibration source containing 259 millicuries of barium-133 was not leak tested from May 9, 1985 to January 10, 1986.

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

- C. Condition 15 of License No. 37-20891-01 requires that licensed material be possessed and used in accordance with statements, representations and procedure contained in application dated July 16, 1985 and letters dated September 10, 1985 and September 21, 1985.

1. Item 14 of the application dated July 16, 1985, requires that surveys be performed in accordance with Procedures for Safely Opening Packages Containing Radioactive Material in Appendix F of Regulatory Guide 10.8.

Item 2(f) of Appendix F requires that the external surface of the final source container be wiped, the wipe assayed and the amount of removable contamination recorded.

Contrary to the above, as of April 22, 1986, wipes were not taken of the final source container in packages of radioactive material.

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

2. Item 17 of the application dated July 16, 1985, requires that surveys be performed in accordance with Area Survey Procedures in Appendix I of Regulatory Guide 10.8.

Item 3 of Appendix I requires that waste storage areas and all other laboratory areas will be surveyed weekly.

Contrary to the above, as of April 22, 1986, weekly surveys and wipe tests were not performed on several occasions from October 1985 thru April 1986.

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

- D. 10 CFR 35.14(f)(2) requires that sealed sources possessed as calibration or reference sources pursuant to 10 CFR 35.14(d) be inventoried quarterly to account for all the sources received and possessed. Records of the inventories shall include the quantities and kinds of byproduct material, location of sources, and the date of the inventory.

Contrary to the above, as of April 22, 1986, quarterly inventory records did not include the locations of the sources.

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

Pursuant to the provisions of 10 CFR 2.201, Springfield Medical Imaging Center 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.