

APPENDIX
NOTICE OF VIOLATION

Holdenville General Hospital
Holdenville, Oklahoma

Docket: 30-02926
License: 35-13393-01

During an NRC inspection conducted on May 19, 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 17 requires, in part, that licensed activities be conducted in accordance with statements, representations, and procedures contained in application dated July 11, 1979; letters dated June 10, 1980, February 11, 1982, March 3, 1983, and July 2, 1985, and Model ALARA program received July 22, 1983.

- a. Item 17 of the license application requires the area surveys to be conducted in accordance with the provisions of Appendix I of Regulatory Guide (RG) 10.8. Appendix I requires, in part, that weekly wipe tests be performed of various areas to measure contamination levels.

Contrary to this requirement, weekly wipe tests were not performed for the period from February 1, 1983, to May 19, 1986.

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

- b. Item 10 of the license application requires the dose calibrator to be calibrated in accordance with the provisions of Appendix D of RG 10.8. Appendix D describes procedures, frequency of calibrations, and recordkeeping to be performed on the dose calibrator. Included among these are: (1) constancy check (daily), (2) linearity tests (quarterly), and (3) accuracy tests (annually).

Contrary to these requirements, the licensee did not use the proper procedures in performing the daily constancy checks and the quarterly linearity tests. The records were not maintained for the annual accuracy tests.

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

- c. Item 7 of the license application requires the Medical Isotopes Committee/Radiation Safety Committee (RSC) duties to be conducted in accordance with the provisions of Appendix B of RG 10.8. Appendix B requires, in part, that the RSC review the entire radiation safety program at least annually to determine that all activities are being conducted safely and in accordance with NRC regulations and the conditions of the license.

Contrary to this requirement, the licensee's RSC did not perform an annual review of the radiation safety program for the inspection period from February 1, 1983 to May 19, 1986.

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

2. License Condition 16 and 10 CFR 35.14 requires, in part, that each elution of technetium-99m from a molybdenum-99/technetium-99m generator to be tested to determine the total molybdenum-99 activity or the concentration of molybdenum-99, and these tests must be performed by written procedures.

Contrary to this requirement, the licensee had not performed molybdenum-99 breakthrough tests during the period of June 11-25, 1983, nor had a procedure for these tests been developed.

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

3. 10 CFR 35.14(e) requires, in part, that the records of the leak test results for sealed calibration sources shall be maintained for inspection by the commission.

Contrary to this requirement, the licensee had not maintained the leak test records for the period from June 11-25, 1983, to May 19, 1986.

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

Pursuant to the provisions of 10 CFR 2.201, Holdenville General Hospital 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 *27th* day of *June*, 1986