

APPENDIX A

NOTICE OF VIOLATION

Veterans Administration Medical and  
Regional Office Center  
White River Junction, Vermont 05001

Docket No. 030-03284  
License No. 44-05123-01

As a result of the inspection conducted on December 16, 1986, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. Condition 16 of License No. 44-05123-01 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated April 2, 1979.

1. Block 10 of this application requires that dose calibrators be calibrated in accordance with procedures contained in Appendix D, Section 2, of Regulatory Guide 10.8.

- a. Item C of Appendix D requires that the licensee compare dose calibrator measured activities for constancy checks with predicted (calculated) values for  $\pm 5$  percent agreement.

Contrary to the above, on December 16, 1986, the licensee made a measurement for constancy of the dose calibrator, however, the technician had not compared the measured value to the predicted value for each commonly used setting. Specifically, the technician was unaware of the limits which would indicate  $\pm 5$  percent agreement.

- b. Item G of Appendix D requires that the licensee perform a check of accuracy of the dose calibration for several radionuclides including Cs-137, Co-57, and Ba-133.

Contrary to the above, the licensee last made a check of accuracy on several radionuclides in April 1985. The licensee has performed limited accuracy checks with Co-57 but failed to perform an accuracy check on a higher energy radionuclide as required by Appendix D.

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- c. Item E.5. of Appendix D requires that dose calibrators be checked for linearity to within  $\pm 5$  percent of calculated values.

Contrary to the above, as of December 16, 1986, linearity checks were performed by the licensee, however, measured values versus calculated values were plotted, and a best fit line was drawn through the data points. This procedure did not provide for a determination of % error as required by Appendix D.

These are Severity Level IV violations. (Supplement IV)

2. Block 17 of this application requires that area survey procedures be performed in accordance with procedures contained in Appendix I, of Regulatory Guide 10.8.

Item 6 of Appendix I requires the licensee to decontaminate areas identified as having  $>200$  DPM/100  $\text{cm}^2$  of contamination.

Contrary to the above, the licensee on May 9, 1986 determined an area to be contaminated to  $>1000$  DPM but took no action to decontaminate the area.

- B. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation on the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set conditions.
1. Contrary to the above, as of December 16, 1986, no surveys (evaluations) were performed to assure compliance with 10 CFR 20.101. Specifically, the dose to the whole body of a employee whose film badge was assigned and returned for the period May 5, 1986 to June 4, 1986, was not evaluated.
  2. Contrary to the above, on December 16, 1986, an inadequate survey was performed of contamination on the hands of a technician who was determined to have hand contamination when the inspector measured radiation levels of 10 mr/hr from the hand. The employee, although claiming to have surveyed his hands, performed an inadequate survey in that he did not detect the contamination.

These are Severity Level IV violations. (Supplement IV)

Pursuant to the provisions of 10 CFR 2.201, Veterans Administration Medical and Regional Office 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.