

**Veterans  
Administration**

NOV 2 1987

In Reply Refer To: 521/115

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Nuclear Materials Safety and  
Safeguards Branch  
Division of Radiation Safety  
and Safeguards  
United States Nuclear Regulatory  
Commission, Region II  
101 Marietta Street, N.W.  
Atlanta, Georgia 30323

Gentlemen:

SUBJECT: Notice of Violation  
(NRC Inspection Report No. 01-00643-02/87-01)

Pursuant to the provisions of 10 CFR 2.201, the following information  
is submitted:

- A. 10 CFR 35.22(a) (2) requires the licensee's Radiation  
Safety Committee to meet at least quarterly.

The Radiation Safety Committee met September 30, 1987. At this  
meeting the Chairman of the committee, Johnny W. Scott, M.D.,  
Ph.D., discussed the importance of quarterly meetings. It was  
emphasized that members who could not attend these meetings  
should send an alternate. The Chairman's secretary will contact  
each member via telephone prior to each meeting, in order to  
alert them of the forthcoming meeting.

- B. License Condition 19 of License No. 01-00643-02 dated August  
10, 1982 (Amendment No. 38) requires the licensee to perform  
a formal annual review of the radiation safety program  
that will include reviews of operating procedures, past  
exposure records and inspections.

Formal annual reviews of the radiation safety program were not  
performed in 1985 or 1986. Periodic reviews of operating procedures,  
past exposure records and inspections were performed at various  
meetings in 1985 and 1986. This violation has been corrected  
in that an annual review was conducted at the September 30,  
1987 meeting. The Radiation Safety Committee established that  
the annual review of radiation safety program will be given  
at the last meeting of each fiscal year.

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- C. 10 CFR 35.50(b) (2), (3), and (4) requires the licensee to test each dose calibrator for accuracy, linearity and geometric dependence upon installation.

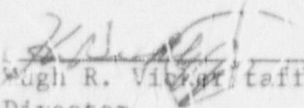
A NPI Accucal 2002 dose calibrator was installed on August 22, 1987 and had not been tested for accuracy, linearity, and geometric dependence as of September 15, 1987. This instrument was used to compare its values with the values obtained from the other dose calibrator, Radx, located in the same area. All dosages for patient administration were performed on the Radx dose calibrator.

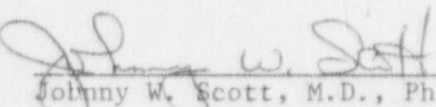
Full compliance has been established for the Accucal 2002 calibrator as of September 21, 1987. The Chairman of the RSC instructed the Radiation Safety Officer to approve operation of all newly acquired instruments prior to use and submit to him a copy of the calibration/procedure and any other required data.

- D. 10 CFR 35.70(a) requires the licensee, after April 1, 1987 to survey with a radiation detection instrument at the end of each day of use, all areas where radiopharmaceuticals are routinely prepared for use or administration.

The licensee did not perform daily surveys of the radiopharmaceutical preparation or administration areas. The licensee did perform surveys three times weekly. Commencing September 16, 1987 the licensee performed surveys in radiopharmaceutical elution, preparation, and administration areas at the end of each day of use with a low-range survey meter.

The Chairman of the RSC has instructed the Radiation Safety Officer to review and initial periodically these survey records.

  
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Hugh R. Vittoria  
Director  
Veterans Administration Medical Center

  
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Johnny W. Scott, M.D., Ph.D.  
Chairman, Radiation Safety Committee