

August 7, 1998

Plaza Nuclear Imaging Center  
ATTN: Elba E. Orduña, M.D.  
Radiation Safety Officer  
Call Box 7886 # 150  
Guaynabo, PR 00970

SUBJECT: NRC INSPECTION REPORT NO. 52-25340-01/98-01 AND NOTICE OF VIOLATION

Dear Dra. Orduña:

This refers to the inspection conducted on July 14, 1998, at your Hato Rey, Puerto Rico facility. The inspection was an examination of activities conducted under your license with respect to radiation safety and compliance with NRC regulations and the conditions of your license. It included selective examinations of procedures and representative records, interviews with personnel, and direct observations by the inspector.

Based on the results of this inspection, the NRC has determined that violations of NRC requirements occurred. The violations are cited in the enclosed Notice of Violation (Notice) and one of them involves a repeat finding from an inspection conducted on November 28, 1995. On that occasion you were using a Geiger counter calibrated to measure radiation levels (millirems per hour) to quantify contamination in terms of disintegrations per minute. This incorrect monitoring technique was used because your well counter was not functional and you did not possess any other adequate survey instrumentation. We are concerned that the same circumstances were noted during this inspection. Repetitive violations are addressed in the NRC's "Statement of Policy and Procedures for NRC Enforcement Actions," (Enforcement Policy), NUREG-1600, Section IV.B. The Enforcement Policy allows the severity level of a violation to be increased if the violation can be considered repetitive. For example, a Severity Level IV violation could be increased to Severity Level III with the attending escalated enforcement action. However, in this case, we have decided not to increase the severity level of this violation based on the overall low safety significance associated with the circumstances involving the violation.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. For your consideration and convenience, an excerpt from NRC Information Notice 96-28, "SUGGESTED GUIDANCE RELATING TO DEVELOPMENT AND IMPLEMENTATION OF CORRECTIVE ACTION," is enclosed. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be placed in the NRC Public Document Room (PDR).

Sincerely,

*original signed by  
C. Hasey for:*

Douglas M. Collins, Director  
Division of Nuclear Materials Safety

Docket No. 030-33894  
License No. 52-25340-01

Enclosures: 1. Notice of Violation  
2. An Excerpt from NRC  
Information Notice 96-28

cc w/encl 1:  
Commonwealth of Puerto Rico

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