

APPENDIX

NOTICE OF VIOLATION

Veterans Administration Medical Center
Denver, Colorado

Docket: 30-01234/89-01
License: 05-01401-02

During an NRC inspection conducted on August 2-3, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violations are listed below:

1. License Condition 19 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in the application dated January 4, 1980.

Item 14, page 42, of the application requires, in part, that incoming packages containing radioactive materials be surveyed at the package surface and at 3 feet from the package surface.

Contrary to the above, incoming packages containing radioactive material were not surveyed at the package surface and at 3 feet from the package surface for the period September 19, 1988, through the date of this inspection.

This is a repeat violation.

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

2. 10 CFR 19.12 requires that all individuals working in a restricted area be instructed in the precautions and procedures to minimize exposure to radiation and radioactive materials, and in the applicable provisions of the Commission's regulations and licenses.

Contrary to the above, as of August 2, 1989, individuals who work in the research areas had not been instructed in the required subjects.

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

3. 10 CFR 20.401(b) requires, in part, that each licensee maintain records showing the results of surveys required by 10 CFR 20.201(b).

Contrary to the above, for the period January 28, 1989, to the date of this inspection, records of surveys were not maintained of decay-in-storage radioactive waste (iodine-131) disposed of as normal waste to ensure compliance with 10 CFR 20.301, which describes authorized means of disposing of radioactive waste.

This is a repeat violation.

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

4. 10 CFR 20.203(f) requires that each container of specified amounts of licensed material bear a durable, clearly visible label identifying the radioactive contents.

Contrary to the above, on August 2, 1989, two lead containers, one containing approximately 7.7 millicuries and one containing approximately 1.6 millicuries of technetium-99m were identified during the inspection and no label had been applied.

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

Pursuant to the provisions of 10 CFR 2.201, Veterans Administration Medical Center 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 violation 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 5th day of September 1989