

APPENDIX A

NOTICE OF VIOLATION

Pacific Radiopharmacy Ltd.  
347 North Kuakini Street  
Honolulu, Hawaii 96817

Docket No. 030-12031  
License No. 53-16991-01 MD  
EA No. 89-45

During an NRC inspection conducted on January 4, 18, February 3, March 17, and 23, 1989, certain 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 (1988), the violations are listed below:

- A. 10 CFR 20.401(b) provides, in part, that each licensee shall maintain records of radioactive material disposed to the sanitary sewerage system.

Contrary to the above requirement, at the time of the inspection, records had not been maintained of the disposal of radioactive material to the sanitary sewerage system.

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

- B. License Condition 19 provides, in part, that the licensee shall process, package, label and distribute licensed material in accordance with statements, representations, and procedures contained in application dated August 28, 1981. Item 15, of the attachment to the application provides, in part, that each month a radiation survey of unrestricted areas surrounding the buildings and laboratories will be made using a low-level survey meter.

Contrary to the above requirement, at the time of the inspection, monthly radiation surveys of unrestricted areas surrounding the buildings and laboratories had not been performed.

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

- C. License Condition 19 provides, in part, that the licensee shall process, package, label and distribute licensed material in accordance with statements, representations, and procedures contained in letter and attachments dated December 10, 1982. Item seven, of Enclosure 10 to the letter entitled "Instructions to Drivers", requires the driver transporting radioactive material to carry the Radioactive Materials Accident Plan and shipping papers near the driver's seat.

Contrary to the above requirement, on January 4, 1989 during the transportation of radioactive materials, the Radioactive Materials Accident Plan and shipping papers were carried in the shipping container in the rear of the vehicle.

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

8904140182 890405  
REG5 LIC30  
53-16991-01MD PDC

- D. License Condition 19 provides, in part, that the licensee shall process, package, label and distribute licensed material in accordance with statements, representations, and procedures contained in application dated August 28, 1981. Item 15, of the attachment to the application provides, in part, that radiation survey records shall include the survey instrument used and the signature of the person performing the survey.

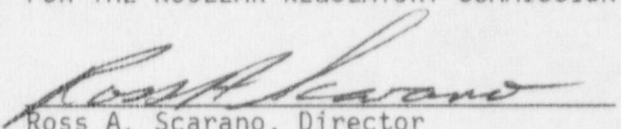
Contrary to the above requirement, laboratory survey records maintained from March 16, 1988 to January 4, 1989, neither indicated the survey instrument used nor the signature of the person performing the survey.

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

Pursuant to the provisions of 10 CFR 2.201, Pacific Radiopharmacy Ltd. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

Dated at Walnut Creek, California  
this 5th day April 1989

  
Ross A. Scarano, Director  
Division of Radiation Safety and  
Safeguards