

# INSPECTION FINDINGS AND LICENSEE ACKNOWLEDGMENT

LICENSEE

National Orthopaedic and Rehabilitation  
Hospital  
2455 Army Navy Drive  
Arlington, Virginia 22206

REGIONAL OFFICE

U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region II - South  
101 Maryland Street, NW  
Atlanta, Georgia 30333

DOCKET NUMBER(S)

030-12232

A. LICENSE NUMBER(S)

45-17123-01

B. DATE OF INSPECTION

5/7/81

## 6. INSPECTION FINDINGS

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The findings as a result of this inspection are as follows:

☒ No items of noncompliance or unsafe conditions were found.

The following items of noncompliance related to records, signs, and labels were found:

- ☐ A. Rooms or areas were not properly posted to indicate the presence of a RADIATION AREA. 10 CFR 20.203(b) or 34.42
- ☐ B. Rooms or areas were not properly posted to indicate the presence of a HIGH RADIATION AREA. 10 CFR 20.203(c) (1) or 34.42
- ☐ C. Rooms or areas were not properly posted to indicate the presence of an AIRBORNE RADIOACTIVITY AREA. 10 CFR 20.203(d)
- ☐ D. Rooms or areas were not properly posted to indicate the presence of RADIOACTIVE MATERIAL. 10 CFR 20.203(e)
- ☐ E. Containers were not properly labeled to indicate the presence of RADIOACTIVE MATERIAL. 10 CFR 20.203(f) (1) or (f) (2)
- ☐ F. A current copy of 10 CFR 20, a copy of the license, or a copy of the operating procedures was not properly posted or made available. 10 CFR 20.206(b)
- ☐ G. Form NRC-3 was not properly posted. 10 CFR 20.206(c)
- ☐ H. Records of the radiation exposure of individuals were not properly maintained. 10 CFR 20.401(a) or 34.33(b)
- ☐ I. Records of surveys or disposals were not properly maintained. 10 CFR 20.401(b) or 34.43(d)
- ☐ J. Records of receipt, transfer, disposal, export or inventory of licensed material were not properly maintained. 10 CFR 30.51, 40.61 or 70.51
- ☐ K. Records of leak tests were not maintained as prescribed in your license, or 10 CFR 34.25(c)
- ☐ L. Records of inventories were not maintained. 10 CFR 34.26
- ☐ M. Utilization logs were not maintained. 10 CFR 34.27
- ☐ N. Records of radiation survey instrument calibration were not maintained. 10 CFR 34.24
- ☐ O. Records of teletherapy electrical interlock tests were not maintained as prescribed in your license.
- ☐ P. Other \_\_\_\_\_

*Robert A. Brown*  
(NRC Inspector)

7. The NRC Inspector has explained and I understand the items of noncompliance listed above. The items of noncompliance will be corrected within the next 30 days.

8506110387 850109  
PDR FOIA  
ENGEL84-789 PDR

(Date)

(Licensee Representative - Title or Position)

21

ORIGINAL TO LICENSEE

C-70 9/83

INSPECTION REPORT NO. 81-01

Attached

National Orthopaedic Rehabilitation Hospital  
2455 Army Navy Drive  
Arlington VA 22206

- ☐ Appendix A
- ☐ Appendix B
- ☐ Appendix C
- ☐ None

Licensee contact: D. Boswell Telephone no.                     

License no. 115-1772-0 Last amendment and date #1 - 2/28/79

Category: G and Priority: IV, as of last amendment.

Inspection date(s): 5/7/81 Type of inspection: Routine - Unannounced

**SUMMARY OF FINDINGS AND ACTION**

- ☒ No noncompliance, clean SS1 issued
- ☐ Noncompliance, Appendix A
- ☐ Action on previous noncompliance, Appendix B

- ☐ Noncompliance, SS1 issued
- ☐ Regional action      HQ action
- ☐ Supplemental info, Appendix C

**RECOMMENDATIONS**

See basis in Appendix C or attached memo.

- ☐ Change Category to:
- ☐ Change Priority to:
- ☐ Next inspection date: 9/83

**PERSONS CONTACTED**

A. Deamant \_\_\_\_\_  
R. Downey \_\_\_\_\_  
M. Waribelt - ext \_\_\_\_\_

Inspector: Robert G. Brown 5/12/81

INSPECTION PLAN AND REPORT NUMBER

21-01

Page 2 of 2

Plan approved: \_\_\_\_\_

Date: \_\_\_\_\_

License no: 45-1775-01

Licensee:

National Center Rehab Hospital

Inspection Items	Scheduled for inspection	Post-inspection status	Module no.	765 Time Info
Management meeting - Entrance and Exit Interviews (REQUIRED)	✓		307032	1/2 hr
Initial Management Meeting				
Program requirements, MC 28 (REQUIRED)	✓		727108	1 1/2 hr
Licensee Event Followup			927002	
Followup on Inspector-identified problems			927012	
Followup on Noncompliance and Deviations			927022	
IE Bulletin/Immediate Action Letter Followup			927032	
Followup on Headquarters Requests			927042	
Followup on Regional Requests			927052	
Independent Inspection Effort (REQ. SPEC)	✓		92706B	1/2 hr
Inspector Dispatched to Site			937003	
Followup on Significant Event Occurring During Inspection			937012	

E. Jenkins - Administrator

\* P. Maribelli - asst

out on  
minutes out

\* Dr. Bruggell - Pathologist - Lead of NM - under RSO  
contract to Hospital.

Dr. Oldmixon - AML

Dr. Cook - AML

Dr. Godwin - AML

Dr. Indege - AML

Dr. Vassallo - "

Dr. Hefter - "

Dr. Helling - "

Dr. Atkan - "

Dr. Bryson - "

~~Dr. Sabot~~ - "

from American  
Medical Labs - Called  
out to read stat scans

Scans routinely read by - Oldmixon - under contract

\* Robert Downing - Chief Tech  
Adrian Leunhardt - Tech

Dr. Jones - Radiologist  
Dr. Frazelle - Radiologist



INSPECTION REPORT NUMBER

21-01

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787128 - Medical

AREAS INSPECTED AND FINDINGS

Licensee: NOOR Hospital

License no: 45-17123-01

Agreement no: 1

INSPECTION ITEMS	CRITERIA	FINDING
		<u>OK</u>

1. Organization

Structure of organization as described in requirements?

Lic Cond

NOTES & REMARKS:

See opposite page.

2. Licensee internal audits

Lic Cond

Scope and frequency of audits as required?  
Conducted by appropriate persons? Records maintained? Reviewed by management?  
Deficiencies identified & corrected?

HPSI - (Health Physics Services, Inc.)  
Quarterly Visits

Isotope Committee

NOTES & REMARKS:

Quarterly - Minutes recorded last meeting 3/10/81

3. Training and qualification of personnel

Lic Cond

Training & retraining conducted as required?  
Written & oral exams conducted? Examination results reviewed by management?  
Instructions to workers per 19.12?

19.12

NOTES & REMARKS:

Noted to be registered 1/11/81

Consultant does some training - housekeeping staff advised quite hazardous

4. Radiation protection procedures

Lic Cond

Procedures available and implemented? Identify radioactive material and dose(s)? Cover handling of patients receiving therapeutic doses? Cover handling of carcasses?  
Emergency procedures for spills, etc?  
Personnel underground procedures?

Procedure Manual

available - covers doses -

NOTES & REMARKS:

emergency procedures posted.

Get material from West on Magnetics

Ordered as needed

- Monthly -  $^{32}\text{P}$  -  $< 1\text{ Ci}$  per week

-  $\text{I}^{125}$  - few thousand curies

-  $\text{I}^{131}$  - none

-  $\text{Xe}^{133}$  - 30 mCi every Monday

- Material shipped in metal boxes

Procedures: ~ 30  $\mu\text{Ci}$  week

10 - Bones: 18 mCi

10 - Joints: 13 mCi

1 - Lung perfusion

2 - Brains: 18 mCi

2 - Liver/Spleen: 3 mCi

Pulmonex Xenon System - with trap

- HPSI checks air flow

- room evacuation - 30 minutes

INSPECTION REPORT NUMBER 81-01

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787102 - Medical

AREAS INSPECTED AND FINDINGS

Licensee: NOA Hospital License no: US-1773-01 Amendment no: 1

INSPECTION ITEM	CRITERIA	FINDING
		<u>OK</u>

5. Use of materials

- Procurement and use as required?
- Special tests (nucly breakthrough, test tests, etc) required?
- Dose calibration checks performed?
- Posting & labeling as required?

Lic Cond   

20.203

NOTES & REMARKS:

Pickup Test Calibration: Daily constancy checks - Records kept.  
Quarterly linearity checks -

6. Storage of materials

- Material secured in both restricted and unrestricted areas? Adequately?

20.207

NOTES & REMARKS:

Hot lab automatically locks -

7. Facilities

- As described in Lic cond or application?
- Any changes made? Adequately?

Lic Cond   

NOTES & REMARKS:

Dynacamera 3c/12  
Scan room with hot lab.

8. Instruments

- Survey meters & instruments adequate for program?
- Instruments & meters operable? Calibrated?
- Calibration adequate?

Lic Cond   

NOTES & REMARKS: See Picker 655-186

Calibrated quarterly by IPEZ

La Jolla Hospital

Test results

INSPECTION REPORT NUMBER 81-01

Page 5 of       
747108 - Medical

AREAS INSPECTED AND FINDINGS

Licensee: NO+R Hospital License no: 45-17123-01 Agreement no: 1

INSPECTION ITEMS	CRITERIA	FINDING
<u>9. Receipt and transfer of material</u>		
Written procedures for pickup, receiving, opening packages?	20.205	<i>Receipts maintained for all material - all packages reviewed for receipt. records kept</i>
Survey of packages when received?	20.205(c)(1)	
Records of survey of packages?	20.401(b)	
Transfer of materials proper? Transfer records maintained?	30.41, 30.51	
Authorized containers used? Shipping papers & package labels proper for packages or hands?	71.5	
NOTES & REMARKS: <i>No transfer under this license.</i>		

<u>10. Personnel protection - external</u>		
Personnel monitoring controls adequate?	20.101, 20.202	<i>Monthly Survey film badge survey. Max. monthly exposure &lt; 50 mrem.</i>
Exposures minimized?	20.102(b), 20.401(a)	
Exposure records (400-4 or 5) maintained?	20.201	
Available for employee review?	20.401	
Surveys conducted? Adequate?	20.1, 20.105	
Records of monitoring, surveys?		
Levels in unrestricted areas within limits?		
NOTES & REMARKS: <i>Daily radiation level surveys - results recorded.</i>		

<u>11. Personnel protection - internal</u>		
Airborne concentrations in restricted areas?	20.103	
Exposures to minors?	20.104	
Posting of airborne radioactivity areas?	20.203(d)	
Survey, monitoring adequate for airborne radioactivity, surface contamination? Records maintained?	20.201 20.401	

NOTES & REMARKS:

*Daily wipe tests - Cont'd with Cont Survey, etc.*

INSPECTION REPORT NUMBER

81-01

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787102 - Medical

## AREAS INSPECTED AND FINDINGS

Licensee:

NOIR Lpital

License no:

45-123-01

Amendment no:

1

INSPECTION ITEM	CRITERIA	FINDING
		OK

## 12. Effluent controls, waste disposal

Release of effluents controlled?

Waste disposals controlled?

Procedures, records maintained?

Surveys made? Adequate?

NOTES &amp; REMARKS:

waste held for decay

20.106, 20.303  
20.301, 20.303, 20.304, 20.305  
20.401, Lic Cond  
20.401

all material surveyed prior to disposal - records kept -

## 13. Notifications and reports

To individuals.

Overexposures, excessive levels &amp; concentrations, incidents.

Personnel exposures and monitoring, termination reports.

Theft or loss of licensed material.

NOTES &amp; REMARKS:

19.13

20.403, 20.405

20.407, 20.408

20.402

None required

## 14. Posting of notices

Part 20, license &amp; documents, procedures, notice of violations posted?

NRC-3 posted?

NOTES &amp; REMARKS:

19.11(a)

19.11(c)

all areas properly posted.

## 15. Other license conditions

Lic



INSPECTION REPORT NUMBER 81-01

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78108 - Medical

AREAS INSPECTED AND FINDINGS

Licensee: NOIR Hospital License no: 45-1723-01 Agreement no: 1

INSPECTION ITEMS	CRITERIA	FINDING
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16. Confirmatory measurements

17. Independent inspection effort

*checked for contamination - none detected*

18. Incidents and events

Any incidents of misadministrations, contamination, etc. not otherwise covered by reports?

*No misadministration*

30 JUL 1981

/ Docket No. 30-01316

Providence Hospital  
ATTN: Sister Irene Krause  
Administrator  
1150 Varnum Street NE  
Washington, D.C. 20017

Gentlemen:

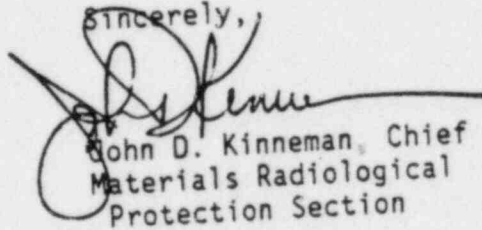
Subject: Inspection 30-01316/81-01

This refers to your letter dated July 10, 1981, in response to our letter dated June 18, 1981.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

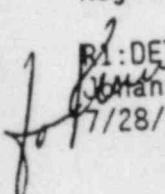
Your cooperation with us is appreciated.

Sincerely,

  
John D. Kinneman, Chief  
Materials Radiological  
Protection Section

cc:  
Public Document Room (PDR)  
Nuclear Safety Information Center (NSIC)  
District of Columbia

Region I Docket Room (with concurrences)

 RI:DETI  
Kinneman/wb  
7/28/81

RI:DETI  
Kinneman  
7/30/81

OFFICIAL RECORD COPY

~~8108110336~~

1p.



1150 varnum street n.e.  
Washington, d.c. 20017  
(202) 269-7000

July 10, 1981

John D. Kinneman, Chief  
Materials Radiological Protection Section  
Technical Inspection Branch  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

REF: 30-01316/81-01

Dear Mr. Kinneman:

This letter in response to your 18 June 1981 letter which describes three activities which were not conducted in full compliance with N.R.C. requirements. The following paragraphs address the cited activities.

- A. A TLD ring badge for one of our Nuclear Medicine Technologist was lost and, therefore, we have no specific data related to the October 1980 extremity exposure for this person. During the nine month period prior to October 1980 and the six month period following October, this individual's extremity exposure were 2149 and 262 mrem respectively. Normalizing both to a twelve month period gives two estimates of annual extremity exposure for this individual of 2865 and 524 mrem. This is between 3.6 and 0.6 percent of the extremity, limits specified in 10CFR20.

During the month of October 1980, this individual was engaged in the same type of work that she had been performing for the past three years and is currently performing.

These facts lead us to the conclusion that the exposure to this individual's hands during October 1980 would have been similar to results in previous months. We have found that this individual's highest monthly hand exposure recorded by a TLD ring badge was 454 mrem. We have directed the TLD ring badge contractor to add 454 mrem to the total lifetime extremity results for this individual in order to estimate the contribution for October 1980.

- B. The Eberline RM-14 survey meter is not used to measure exposure rates, therefore it has not been routinely calibrated; it has been simply checked for operatoral response to ionizing radiation. In response to your statement, we have initiated a procedure whereby its response to a brown longlived radioactive source is checked annually to test reproducibility.

a daughter of charity hospital serving the Washington community since 1859

8108110349 2pp



1150 varnum street n.e.  
washington, d.c. 20017  
(202) 269-7000

response of the instrument.

- B. Linearity checks on the dose calibrator are now being performed and documented quarterly.

Sincerely yours,

Carlos R. Matta, Chief  
Section of Nuclear Medicine

18 JUN 1981

✓ Docket No. 30-01316

Providence Hospital  
ATTN: Sister Irene Krause  
Administrator  
1150 Varnum Street N.E.  
Washington, D. C. 20017

Gentlemen:

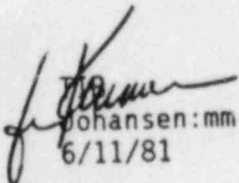
Subject: Inspection 30-01316/81-01

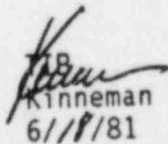
This refers to the routine safety inspection conducted by Ms. J. Johansen of this office on May 19, 1981 of activities authorized by NRC License No. 08-01728-01 and to the discussions of our findings held by Ms. Johansen with Ms. Shannon and Dr. C. Matta at the conclusion of the inspection.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These items of noncompliance have been categorized into the levels described in the Federal Register Notice (45 FR 66754) dated October 7, 1980. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

  
Johansen:mm  
6/11/81

  
Kinneman  
6/18/81

8107060352

2pp.



Providence Hospital

2

18 JUN 1981

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

John D. Kinneman, Chief, Materials  
Radiological Protection Section,  
Technical Inspection Branch

Enclosure: Appendix A, Notice of Violation

cc w/encl:

Dr. C. Matta, Radiation Safety Officer ✓

bcc w/encl:

Document Management Branch, TIDC (For Distribution) ✓

REG:I Reading Room ✓

District of Columbia ✓

Chief, Operational Support Section (w/o encl) ✓

APPENDIX A

NOTICE OF VIOLATION

Providence Hospital  
Washington, D.C. 20017

Docket No. 30-01316  
License No. 08-01728-01

As a result of the inspection conducted on May 19, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 20.201(b) requires that you make such surveys as may be necessary for you to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to this requirement, as of the day of the inspection, May 19, 1981, you failed to make such surveys as were necessary to assure compliance with 10 CFR 20.101, a regulation which limits radiation exposure to the extremities of individuals. Specifically, you failed to evaluate the radiation dose to the hand and fingers of an individual who handled millicurie amounts of technetium-99m during October 1980 and whose TLD ring badge was lost.

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

- B. Condition 15 of your license requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in your application dated January 16, 1978, your letter received June 5, 1978 and your letter dated July 7, 1978.

1. Attachment B to your application dated January 16, 1978 requires that survey instruments be calibrated annually.

Contrary to this requirement, on the day of the inspection, May 19, 1981, your Eberline RM-14 survey meter had not been calibrated in the last 12 months.

2. Item 4 of your letter received June 5, 1978 requires that linearity tests on your dose calibrator be performed according to the procedures in NUREG-0338, Appendix D, Section 2. Item A.1 of Appendix D, Section 2 requires quarterly linearity tests.

Contrary to this requirement, as of the day of the inspection, May 19, 1981, linearity tests had not been performed on your dose calibrator since July 1980.

These are Severity Level V Violations (Supplement VII).

~~8107060355~~

12pp.

Pursuant to the provisions of 10 CFR 2.201, Providence Hospital is hereby required to submit to this office within thirty days of the date of 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. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated 18 JUN 1981

John D. Kinneman, Chief  
Materials Radiological Protection  
Section

INSPECTION REPORT NO. 81-01

Attached

☐ Appendix A☐ Appendix B☐ Appendix C☐ Memo

Providence Hospital  
1150 Varnum Street N.E.  
WASHINGTON, D.C. 20017

Licensee contact: Dr. MatlaTelephone no. 202 269-4000License no. 08-01728-01Last amendment and date: 32 11/15/78Category: G and Priority: TO as of last amendment.Inspection date(s): May 19, 1981Type of inspection: 14 Unann

## SUMMARY OF FINDINGS AND ACTION

- ☐ No noncompliance, clear 591 issued  
☐ Noncompliance, Appendix A  
☐ Action on previous noncompliance, Appendix B

- ☐ Noncompliance, 591 issued  
☐ Regional action Hq action  
☐ Supplemental info, Appendix C

## RECOMMENDATIONS

See basis in Appendix C or attached memo.

☐ Change Category to:           ☐ Change Priority to:           ☐ Next inspection date: May 19 83

## PERSONS CONTACTED

Sister Irene Krause President.@ Dr. MatlaMs. Shannon Chief TechInspector: D. ShannonApproved: D. Costello for (K)5/29/81

8-10:30 AM

Date: \_\_\_\_\_

Licensee: \_\_\_\_\_

Inspection Items	Scheduled for Inspection	Post-Inspection Status	Module No.	766 Time Info
Management Meeting - Entrance and Exit Interviews (Required)	✓	✓	30703B	1/4 hr
Program Requirements, MC 2860 (Required)	✓	✓	78710B	1/2 hr
Followup on Noncompliance and Deviations			92702B	—
Independent Inspection Effort (Required)	✓	✓	92706B	1 1/2 hr
Transportation	✓	✓	86740B	1/4 hr
Licensee Event Followup			92700B	
Followup on Inspector-Identified Problems			92701B	
IE Bulletin/Immediate Action Letter Followup			92703B	
Followup on Headquarters Requests			92704B	
Followup on Regional Requests			92705B	
Inspector Dispatched to Site			93700B	
Followup on Significant Event Occurring During Inspection			93701B	
Initial Management Meeting			38800B	



## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
1. <u>Organization</u>		<u>C</u>
Structure of organization as described in requirements?	Lic Cond _____	
NOTES & REMARKS:		

2. <u>Licensee internal audits</u>	Lic Cond _____	<u>C</u>
Scope and frequency of audits as required?		
Conducted by appropriate persons? Records maintained? Reviewed by management?		
Deficiencies identified & corrected?		
NOTES & REMARKS:		

*Audit of procedures required,*

3. <u>Training and qualification of personnel</u>	Lic Cond _____	<u>C</u>
Training & retraining conducted as required?		
Written & oral exams conducted? Examination results reviewed by management?		
Instructions to workers per 19.12?	19.12	
NOTES & REMARKS:		

*Suggest Training of techs in L/C of license and documents*

4. <u>Radiation protection procedures</u>	Lic Cond _____	<u>C</u>
Procedures available and implemented? Identify radiopharmaceutical and dose(s)? Cover handling of patients receiving therapeutic doses? Cover handling of cadavers?		
Emergency procedures for spills, etc?		
Personnel understand procedures?		
NOTES & REMARKS:		

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
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5. Use of materials

Lic Cond \_\_\_\_\_

N/CProcurement and use as required? OKSpecial tests (moly breakthrough, leak tests, etc) required? N/AUse calibration checks performed? N/CPosting & labeling as required? OK

20.203

not Linearly since July 1960

NOTES &amp; REMARKS:

6. Storage of materials

Material secured in both restricted and unrestricted areas? Adequately?

20.207

NOTES &amp; REMARKS:

7. Facilities

Lic Cond \_\_\_\_\_

As described in lic cond or application?

Any changes made? Adequacy?

NOTES &amp; REMARKS:

8. Instruments

Lic Cond \_\_\_\_\_

Survey meters &amp; instruments adequate for program?

Instruments & meters operable? Calibrated?  
Calibration adequate?

NOTES &amp; REMARKS:

Eberline RM-14  
not calibrated } But with in the last year

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
<u>9. Receipt and transfer of material</u>		
Written procedures for pickup, receiving, opening packages?	20.205	<u>C</u>
Survey of packages when received?	20.205(c)(1)	
Records of survey of packages?	20.401(b)	
Transfer of materials proper? Transfer records maintained?	30.41, 30.51	
Authorized containers used? Shipping papers & package labels proper for packages on hand?	71.5	
NOTES & REMARKS:		

10. Personnel protection - external

Personnel monitoring controls adequate?	20.101, 20.202
Exposures minimized?	
Exposure records (NRC-4 or 5) maintained?	20.102(b), 20.401(a)
Available for employee review?	
Surveys conducted? Adequate?	20.201
Records of monitoring, surveys?	20.401
Levels in unrestricted areas within limits?	20.1, 20.105

NOTES &amp; REMARKS:

*Failure evaluation done to ext 10/01/80 to 11/05/80 of Tech - TD lost. no more any*

11. Personnel protection - internal

Airborne concentrations in restricted areas?	20.103
Exposures to minors?	20.104
Posting of airborne radioactivity areas?	20.203(d)
Survey, monitoring adequate for airborne radioactivity, surface contamination? Records maintained?	20.201 20.401

NOTES &amp; REMARKS:

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
12. <u>Effluent controls, waste disposal</u>		<u>C</u>
Release of effluents controlled?	20.106, 20.303	
Waste disposals controlled?	20.301, 20.303, 20.304, 20.305	
Procedures, records maintained?	20.401, Lic Cond _____	
Surveys made? Adequate?	20.401	

NOTES &amp; REMARKS:

13. <u>Notifications and reports</u>		<u>C</u>
To individuals.	19.13	
Overexposures, excessive levels & concentrations, incidents.	20.403, 20.405	
Personnel exposures and monitoring, termination reports.	20.407; 20.408	
Theft or loss of licensed material.	20.402	

NOTES &amp; REMARKS:

14. <u>Posting of notices</u>		<u>C</u>
Part 20, license & documents, procedures, notice of violations posted?	19.11(a)	
NRC-3 posted?	19.11(c)	

NOTES &amp; REMARKS:

*Send new 19, & 20, 35*

15. <u>Other license conditions</u>	Lic	_____
-------------------------------------	-----	-------

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
------------------	----------	---------

16. Confirmatory measurements

Radiation levels Hot lab Isotope Storage 0.5-0.5  
mR/hr

17. Independent inspection effort

Accountability for prescription compliance records  
Special Area Considerations  
Wipes  
Labeling  
X-ray procedures

KR 8/1/81

18. Incidents and events

Any incidents of misadministrations,  
contamination, etc. not otherwise  
covered by reports?



INSPECTION REPORT NUMBER \_\_\_\_\_

## APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licenses: \_\_\_\_\_

License no: \_\_\_\_\_

Reference	Basis for noncompliance
Report item <u>5</u> 10 CFR _____ Lic Cond <u>15</u> Type n/c <u>IV</u>	Letter of May 1978 received 6/5/78 Item 4 requires linearity tests on dose calibrator as per Section 2E Appendix D of NUREG-0338 - Not done since July 1980.
Report item <u>8</u> 10 CFR _____ Lic Cond <u>15</u> Type n/c <u>IV</u>	Attachment B of your application requires Survey instruments be calibrated annually. Your Eberline RM-14 has not been calibrated in the last 12 months.
Report item <u>10</u> 10 CFR <u>20.201</u> Lic Cond _____ Type n/c <u>IV</u>	Failure to evaluate dose to hands of tech for Oct 1980 when TLD ring lost.
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	

## APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

Identification and summary of action taken	Status
Report no: _____ Type n/c: _____ Describe: _____	
Action taken: _____	OPEN CLOSED
Report no: _____ Type n/c: _____ Describe: _____	
Action taken: _____	OPEN CLOSED
Report no: _____ Type n/c: _____ Describe: _____	
Action taken: _____	OPEN CLOSED
Report no: _____ Type n/c: _____ Describe: _____	
Action taken: _____	OPEN CLOSED
Report no: _____ Type n/c: _____ Describe: _____	
Action taken: _____	OPEN CLOSED

INSPECTION REPORT NUMBER \_\_\_\_\_

Page \_\_\_\_ of \_\_\_\_

APPENDIX C - SUPPLEMENTARY INFO \_\_\_\_\_

Licenses: \_\_\_\_\_

License no: \_\_\_\_\_

☐ Uncorrected/repeated noncompliance

☐ Unresolved items

☐ Unusual occurrence, conditions, etc

☐ Inspector's comments

☐ Basis for change of Category or Priority

12 AUG 1981

Docket Nos. 30-01323 ✓  
30-12851

Children's Hospital National Medical Center  
ATTN: John J. Mallon, Jr.  
Administrator  
111 Michigan Avenue, N.W.  
Washington, D.C. 20010

Gentlemen:

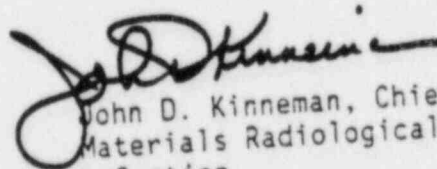
Subject: Combined Inspection 30-01323/81-01 and 30-12851/81-01

This refers to your letter dated July 14, 1981, in response to our letter dated June 29, 1981.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

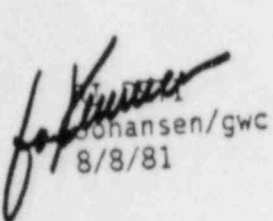
Your cooperation with us is appreciated.

Sincerely,

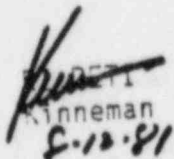


John D. Kinneman, Chief  
Materials Radiological Protection  
Section

cc:  
Public Document Room (PDR) ✓  
Nuclear Safety Information Center (NSIC) ✓  
District of Columbia ✓



Johansen/gwc  
8/8/81



Kinneman  
8-12-81

OFFICIAL RECORD COPY

~~8108180284~~  
2pp.

bcc:  
Region I Docket Room (with concurrences)

OFFICIAL RECORD COPY





childrens hospital  
national medical center

DEPARTMENT OF CHILD HEALTH AND  
CHILD HEALTH CENTER

111 MICHIGAN AVENUE, N.W., WASHINGTON, D.C. 20010 • (202) 745-5079  
DEVELOPMENT, GEORGE WASHINGTON UNIVERSITY  
RESEARCH FOUNDATION OF CHILDREN'S HOSPITAL

DEPARTMENT OF RADIOLOGY

July 14, 1981

Mr. Thomas T. Martin, Acting Director  
Division of Engineering and Technical Inspection  
United States Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Martin:

This is in reply to your letter of June 29, 1981, pursuant to the items of noncompliance with NRC requirements at the time of inspection on May 18, 1981. The following comments are with reference to the specific items of noncompliance enclosed with your letter.

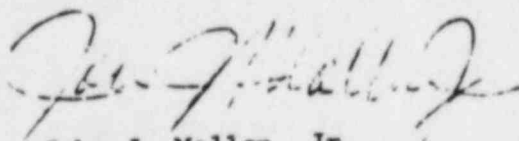
Paragraph A. Personnel exposure records beginning with January 1, 1980 have been reviewed for missing data. For those periods for which a whole body film badge and/or TLD ring badge reading was not available an exposure based on an average of three consecutive prior months was assigned. A check list has been in effect since January 1, 1981 that logs the return of film badges for processing. If after two months a badge is not returned, then an exposure will be assigned based on the average exposure received in the three previous months for that individual. The Radiation Safety and Medical Isotopes Committee has considered the problem of failure to return film badges in a timely manner. As a result, the Committee has issued a memorandum explaining the film badge return policy for Children's Hospital. If an individual's film badges are not returned for a period of three consecutive months, then the individual's privilege to work with radiation sources will be revoked by the Committee. Full compliance has been achieved.

Paragraph B. Syringe shields, vial shields, and syringes of a better design for work with pediatric patients have been procured and will be utilized when practicable. Nuclear Medicine personnel have been instructed in their use and importance when preparing and injecting radiopharmaceuticals. The Radiation Safety Officer will make frequent inspections to ensure that the use of syringe shields is followed regularly. Full compliance has been achieved.

8/108/80294  
2pp

We found the NRC inspection of May 18, 1981 to be thorough and an informative contribution to the Radiation Safety Program at Children's Hospital. It is hoped that this constitutes a satisfactory reply to your recent letter.

Sincerely,

A handwritten signature in dark ink, appearing to read "John J. Mallon, Jr.", written in a cursive style.

John J. Mallon, Jr.  
Administrator

JJM/dks

29 JUN 1981

✓ Docket Nos. 30-01323  
30-12851

Children's Hospital National Medical Center  
ATTN: John J. Mallon, Jr.  
Administrator  
111 Michigan Avenue, N.W.  
Washington, D.C. 20010

Gentlemen:

Subject: Combined Inspection 30-01323/81-01 and 30-12851/81-01

This refers to the routine safety inspection conducted by Ms. J. Johansen of this office on May 18, 1981 of activities authorized by NRC License Nos. 08-03309-01 and 08-03309-04 and to the discussions of our findings held by Ms. Johansen with you, Mr. Pickwick, Dr. Fearon and Dr. Majd of your staff at the conclusion of the inspection.

The inspection was an examination of activities conducted under your licenses as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of your licenses. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector.

Our inspector also verified the steps you have taken to correct the items of noncompliance brought to your attention in the enclosure to our letter dated May 9, 1980. We have no further questions regarding the steps you took to correct items A, B.1, B.2, D.2, D.3, D.4, and E. With regard to item D.1, this item has recurred.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These items of noncompliance have been categorized into the levels described in the Federal Register Notice (45 FR 66754) dated October 7, 1980. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

Item B in the Notice of Violation enclosed with this letter was identified during a previous inspection of your licensed activities on April 8, 1980, and was documented in the enclosure to our letter dated May 9, 1980. Your letter

TJB  
Johansen  
6/26/81

TJB  
Kroneman  
6/26/81

Joyner  
6/26/81

DEI  
T. Martin  
6/26/81

8107100236  
2pp

29 JUN 1981

to this office dated May 29, 1980 stated that the Director of Nuclear Medicine will make more frequent inspections to insure use of syringe shields. From our May 18, 1981 inspection, it appears that the stated corrective actions were not effective since this item has recurred. Recurrent and uncorrected items of noncompliance are given additional weight in the consideration and selection of appropriate enforcement action. Therefore, in your response to this letter, you should give particular attention to those actions taken or planned to ensure that identified items of noncompliance will be completely corrected and will not recur.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Thomas T. Martin, Acting Director  
Division of Engineering and Technical  
Inspection

Enclosure: Appendix A, Notice of Violation

cc w/encl:

Dr. T. Fearon, Radiation Safety Officer

bcc w/encl:

Document Management Branch, TIDC (For Distribution) ✓

REG:I Reading Room ✓

District of Columbia ✓

Chief, Operational Support Section (w/o encl) ✓

APPENDIX A

NOTICE OF VIOLATION

Children's Hospital National Medical Center  
Washington, D. C. 20010

Docket No. 30-01323  
License No. 08-03309-01

As a result of the inspection conducted on May 18, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 20.201(b) requires that you make such surveys as may be necessary for you to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to this requirement, as of the day of the inspection, May 18, 1981, you failed to make such surveys as necessary to assure compliance with 10 CFR 20.101(a), "Radiation Dose Standards for individuals in restricted areas." Specifically, you failed to evaluate or assign a radiation exposure to individuals whose TLD ring badges and whole body badges were lost during several months in 1980.

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

- B. Condition 21 of License No. 08-03309-01 requires that you possess and use licensed material in accordance with the statements, representations and procedures contained in your application dated December 5, 1975. The CHNMC Radiation Safety Manual is included with this application.

Item 4(c), "Requirements of individuals Using Radioactive Materials", of the CHNMC Radiation Safety Manual, requires that individuals working with radioactive materials use shields whenever possible.

Contrary to this requirement, as of the day of the inspection, May 18, 1981, an individual in your Nuclear Medicine Laboratory did not use a syringe shield when drawing up 60 millicuries of technetium-99m to prepare a radiopharmaceutical. The use of a syringe shield was possible during this operation.

This is a Severity Level IV Violation (Supplement VII).

Pursuant to the provisions of 10 CFR 2.201, Children's Hospital National Medical Center is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results

8107100237  
12pp



achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated 29 JUN 1981

Thomas T. Martin, Acting Director  
Division of Engineering and Technical  
Inspection

INSPECTION REPORT NO. 81-01  
NATIONAL  
CHILDRENS HOSPITAL MEDICAL CENTER  
111 MICHIGAN AVE N.W.  
WASHINGTON, D.C. 20010

Attached  
☐ Appendix A  
☐ Appendix B  
☐ Appendix C  
☐ Memo

Licensee contact: Dr McSwain Telephone no. 202 745-5000  
08-03309-04

License no. 08-03309-01 Last amendment and date: 31 6/30/77

Category: G1 and Priority: III as of last amendment.

Inspection date(s): May 18, 1981 Type of inspection: Rt Unannounced

SUMMARY OF FINDINGS AND ACTION

☒ No noncompliance, clear 591 issued  
☒ Noncompliance, Appendix A  
☒ Action on previous noncompliance, Appendix B

☐ Noncompliance, 591 issued  
☐ Regional action Hq action  
☐ Supplemental info, Appendix C

RECOMMENDATIONS

See basis in Appendix C or attached memo.

☐ Change Category to: 5/83  
☐ Next inspection date: 5/83

☐ Change Priority to:     

PERSONS CONTACTED

\* Dr Thomas Fearon RSO  
Ms Gladys Kennedy NMT  
Dr Current  
Mr Nayan Pandya Chrg NMT  
\* John Mallon, Administrator

\* Chris Pickens Administration  
\* Dr M. Majd, Chair NSC  
Dr Daphney Researcher  
Judy Staley Researcher

Inspector: Jerry M Johanson  
 Approved: Costello for B

5/18/81  
5/29/81

Plan Approved: \_\_\_\_\_ Date: \_\_\_\_\_

Licensee: \_\_\_\_\_

License No: \_\_\_\_\_

Inspection Items	Scheduled for Inspection	Post-Inspection Status	Module No.	766 Time Info
Management Meeting - Entrance and Exit Interviews (Required)	✓	✓	30703B	1/2 hr
Program Requirements, MC 2860 (Required)	✓	✓	78710B	1 1/2 hr
Followup on Noncompliance and Deviations	✓	✓	92702B	1/2 hr
Independent Inspection Effort (Required)	✓	✓	92706B	3 1/2 hr
Transportation	✓	✓	86740B	1/2 hr
Licensee Event Followup			92700B	
Followup on Inspector-Identified Problems			92701B	
IE Bulletin/Immediate Action Letter Followup			92703B	
Followup on Headquarters Requests			92704B	
Followup on Regional Requests			92705B	
Inspector Dispatched to Site			93700B	
Followup on Significant Event Occurring During Inspection			93701B	
Initial Management Meeting			38800B	
<del>8:30-4:00</del> 8:30-4:00				

INSPECTION REPORT NUMBER \_\_\_\_\_

Page 3 of \_\_\_\_\_

747108 - Medical

AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
------------------	----------	---------

1. Organization

Structure of organization as described in requirements?

Lic Cond \_\_\_\_\_

NOTES & REMARKS:

*new RSO*

2. Licensee internal audits

Scope and frequency of audits as required?  
Conducted by appropriate persons? Records maintained? Reviewed by management?  
Deficiencies identified & corrected?

Lic Cond \_\_\_\_\_

NOTES & REMARKS:

*Yes Quarterly Dr T. Fearon*

3. Training and qualification of personnel

Training & retraining conducted as required?  
Written & oral exams conducted? Examination results reviewed by management?  
Instructions to workers per 19.12?

Lic Cond \_\_\_\_\_

19.12

NOTES & REMARKS:

4. Radiation protection procedures

Procedures available and implemented? Identify radiopharmaceutical and dose(s)? Cover handling of patients receiving therapeutic doses? Cover handling of cadavers?  
Emergency procedures for spills, etc?  
Personnel understand procedures?

Lic Cond \_\_\_\_\_

NOTES & REMARKS:

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
<u>5. Use of materials</u>	Lic Cond _____	<u>C</u>
Procurement and use as required?		
Special tests (moly breakthrough, leak tests, etc) required?		
Dose calibration checks performed?		
Posting & labeling as required?	20.203	
NOTES & REMARKS:		
<u>6. Storage of materials</u>		<u>C</u>
Material secured in both restricted and unrestricted areas? Adequately?	20.207	
NOTES & REMARKS:		
<u>7. Facilities</u>	Lic Cond _____	<u>C</u>
As described in lic cond or application?		
Any changes made? Adequacy?		
NOTES & REMARKS:		
<u>8. Instruments</u>	Lic Cond _____	<u>C</u>
Survey meters & instruments adequate for program?		
Instruments & meters operable? Calibrated?		
Calibration adequate?		
NOTES & REMARKS:		



## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
<u>9. Receipt and transfer of material</u>		
Written procedures for pickup, receiving, opening packages?	20.205	<u>C</u>
Survey of packages when received?	20.205(c)(1)	
Records of survey of packages?	20.401(b)	
Transfer of materials proper? Transfer records maintained?	30.41, 30.51	
Authorized containers used? Shipping papers & package labels proper for packages on hand?	71.5	
<u>NOTES &amp; REMARKS:</u>		

10. Personnel protection - external

Personnel monitoring controls adequate?	20.101, 20.202
Exposures minimized?	
Exposure records (NRC-4 or 5) maintained?	20.102(b), 20.401(a)
Available for employee review?	
Surveys conducted? Adequate?	20.201
Records of monitoring, surveys?	20.401
Levels in unrestricted areas within limits?	20.1, 20.105

## NOTES &amp; REMARKS:

*file badges - (missing) for evaluation* ① *Various TLDs and WB's in 1980*  
*Syringe shields - Repeat criteria 80-8* ②

11. Personnel protection - internal

Airborne concentrations in restricted areas?	20.103
Exposures to minors?	20.104
Posting of airborne radioactivity areas?	20.203(d)
Survey, monitoring adequate for airborne radioactivity, surface contamination? Records maintained?	20.201 20.401

## NOTES &amp; REMARKS:

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
<u>12. Effluent controls, waste disposal</u>		<u>C</u>
Release of effluents controlled?	20.106, 20.303	
Waste disposals controlled?	20.301, 20.303, 20.304, 20.305	
Procedures, records maintained?	20.401, Lic Cond _____	
Surveys made? Adequate?	20.401	
NOTES & REMARKS:		
<u>13. Notifications and reports</u>		<u>C</u>
To individuals.	19.13	
Overexposures, excessive levels & concentrations, incidents.	20.403, 20.405	
Personnel exposures and monitoring, termination reports.	20.407; 20.408	
Theft or loss of licensed material.	20.402	
NOTES & REMARKS:		
<u>14. Posting of notices</u>		<u>C</u>
Part 20, license & documents, procedures, notice of violations posted?	19.11(a)	
NRC-3 posted?	19.11(c)	
NOTES & REMARKS:		
<u>15. Other license conditions</u>	Lic	<u>C</u>

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
16. <u>Confirmatory measurements</u>		<u>C</u>

*Unrested OK*  
*Rest OK*

17. Independent inspection effortNA

Accountability for therapeutic implant services  
Special Use Considerations  
  Wear  
  Labeling  
  X-ray procedures

*none*

18. Incidents and eventsC

Any incidents of misadministrations,  
contamination, etc, not otherwise  
covered by reports?

*none*

## APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

Reference	Basis for noncompliance
Report item <u>10</u>	TLD rings and W.B badge - records indicated
10 CFR <u>201.16101</u>	were lost and not processed by spm film
Lic Cond _____	badge Co in addition Manual reading during
Type n/c _____	July in TLD and WB not evaluated as to material
	handled, risk time, unclear to ensure accuracy of
	evaluation: 7/10, 10/10/ 11/10/ 12/10/ 80

Report item <u>10</u>	60 mCi of Tc drawn up without syringe
10 CFR _____	shield I ten Y(c) manual license.
Lic Cond <u>21</u>	
Type n/c _____	

Report item _____
10 CFR _____
Lic Cond _____
Type n/c _____

Report item _____
10 CFR _____
Lic Cond _____
Type n/c _____

Report item _____
10 CFR _____
Lic Cond _____
Type n/c _____

## APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

Identification and summary of action taken

Status

Report no: 80-01 Type n/c: inf Describe: 20.108b) > 2 mken uncratvictu  
 Action taken: Area stove room next to hot lab.

CLOSED

leveling Hot lab  $\leq .5$  mK/hr

Report no: 80-01 Type n/c: inf Describe: 20.201 - no survey Rad  
 Action taken: levels untest. 20.10/a rad in area.  
Rad levels not adequately  
reflected.

CLOSED

Rad levels  $\leq .5$  mK/hr in area reflects

Report no: 80-01 Type n/c: inf Describe: LC-21 Shields not  
 Action taken: and CHNMC - Rad Syg  
Item 4C3

CLOSED

60 m Ci drawn up without signing shield when making Te - HBP

Report no: 80-01 Type n/c: inf Describe: Item 7 - no survey  
 Action taken: work area contamination

CLOSED

Daily survey log kept - and up to date

Report no: 81-01 Type n/c: inf Describe: Item 9 RSO - record  
 Action taken: & all RAM received.

CLOSED

R so keeps records on receipt of packages up to date.



## APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

Identification and summary of action taken	Status
--------------------------------------------	--------

Report no: <u>80-01</u> Type n/c: <u>4y</u> Describe: <u>Plan April 20 letter</u>	
-----------------------------------------------------------------------------------	--

Action taken:

instruction in contents  
of CHNMC Rad Safety  
Manual.

OPEN

CLOSED

May 5, 1981 Training session personnel attend: documented

Report no: <u>80-01</u> Type n/c: <u>inf</u> Describe: <u>14 leak test</u>	
----------------------------------------------------------------------------	--

Action taken:

Scaled sources  
CS-137 not done.  
July 1, 1980?

OPEN

CLOSED

leak tests performed

Report no: _____ Type n/c: _____ Describe: _____	
--------------------------------------------------	--

Action taken:

OPEN

CLOSED

Report no: _____ Type n/c: _____ Describe: _____	
--------------------------------------------------	--

Action taken:

OPEN

CLOSED

Report no: _____ Type n/c: _____ Describe: _____	
--------------------------------------------------	--

Action taken:

OPEN

CLOSED

## APPENDIX C - SUPPLEMENTARY INFO \_\_\_\_\_

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

- ☐ Uncorrected/repeated non-compliance  
☐ Unusual occurrence, conditions, etc  
☐ Basis for change of Category or Priority

- ☐ Unresolved items  
☐ Inspector's comments

Dr Tom Fearon new RSO - preparing  
 new license application and amendments  
 New hot lab in process. Overall program  
 greatly improved due to New R.S.O. reversing  
 a program underway. 5 Research holes  
 at present

<del>4/10/80 - 5/9/80</del>	Missing
<del>5/10/80 - 6/9/80</del>	Kennedy U-3 <sup>from</sup> 5/10/80
	WB Kennedy found 6/10
M M - 7/10 - 8/9/80	Kennedy
U-3 " "	Pandya Missing -
<del>9/10/80</del>	<del>U-3 Kennedy</del>
10/10/80 - 11/9/80	PANDYA U-3 -
	Kennedy WB -
11-10-12/9/80 -	WB Kennedy ✓
12/10/80 -	Kennedy U-3 ✓

27 AUG 1981

✓ Docket No. 30-1317

Department of the Army  
Walter Reed Army Medical Center  
ATTN: HSWP-QHP  
Washington, DC 20012

Gentlemen:

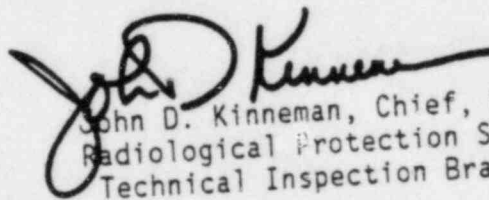
Subject: Inspection 30-1317/81-01

This refers to your letter dated July 23, 1981, in response to our letter dated June 29, 1981.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

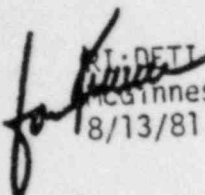
Sincerely,



John D. Kinneman, Chief, Materials  
Radiological Protection Section  
Technical Inspection Branch

cc:  
Officer in Charge, DASG-PSP,  
Dept. of the Army  
D. N. Taras, Chief, Health Physics Safety Office  
Dept. of the Army  
Public Document Room (PDR)  
Nuclear Safety Information Center (NSIC)  
District of Columbia

bcc:  
Region I Docket Room (with concurrences)

 NI-DETI  
Kinneman:hh  
8/13/81

 NI-DETI  
Kinneman  
8-24-81

OFFICIAL RECORD COPY

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DEPARTMENT OF THE ARMY  
WALTER REED ARMY MEDICAL CENTER  
WASHINGTON, D.C. 20012

23 JUL 1981

REPLY TO  
ATTENTION OF

BSWP-QHF

SUBJECT: Inspection 81-01 Docket No. 30-1317, License No. 08-1738-02

US Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

1. Reference: USNRC letter, SAB 29 June 1981.

2. Corrective actions taken are as follows:

a. All student technologists were issued finger-ring thermoluminescent dosimeters by 13 July 1981 and instructed on the wear of these dosimetric devices.

b. Coordination has been accomplished between Health Physics and Nuclear Medicine so that new students can be issued finger dosimetry upon arrival at Walter Reed Army Medical Center.

FOR THE COMMANDER:

*for* *Harry J. Mumma*  
PATRICK J. MUMMA  
MAJ, MSG  
Adjutant General

~~8109010518~~

1p.

29 JUN 1981

✓ Docket No. 30-1317

Department of the Army  
Walter Reed Army Medical Center  
ATTN: Major General Bernhard T. Mithemeyer, MD  
Commanding Officer  
Washington, DC 20012

Gentlemen:

Subject: Inspection 81-01

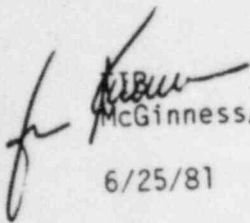
This refers to the routine safety inspection conducted by Miss J. McGinness of this office on June 2 - 4, 1981 of activities authorized by NRC License No. 08-1738-02 and to the discussions of our findings held by Miss McGinness with yourself and members of your staff at the conclusion of the inspection.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector.

Our inspector also verified the steps you have taken to correct the item of noncompliance brought to your attention in the enclosure to our letter dated April 22, 1980. We have no further questions regarding your action at this time.

Based on the results of this inspection, it appears that one of your activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. This item of noncompliance has been categorized into the levels described in the Federal Register Notice (45 FR 66754) dated October 7, 1980. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

 McGinness/cgl

6/25/81

 Kinneman

6/29/81

~~8107170018~~  
2pp,

29 JUN 1981

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

John D. Kinneman, Chief, Materials  
Radiological Protection Section,  
Technical Inspection Branch

Enclosure: Appendix A, Notice of Violation

cc w/encl:

Officer in Charge, DASG-PSP, ✓

Dept. of the Army

D. N. Taras, Chief, Health Physics Safety Office ✓

Dept. of the Army

bcc w/encl:

Document Management Branch TIDC (For Distribution) ✓

REG:I Reading Room ✓

State of Maryland ✓

District of Columbia ✓

Chief, Operational Support Section ✓



APPENDIX A

NOTICE OF VIOLATION

Walter Reed Army Medical Center  
Washington, D.C. 20012

Docket No. 30-1317  
License No. 08-1738-02

As a result of the inspection conducted on June 2-4, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

10 CFR 20.201(b) requires that you make such surveys as may be necessary for you to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to this requirement, as of the day of the inspection, June 2-4, 1981, you failed to perform such surveys (evaluations) as were necessary to assure compliance with that part of 10 CFR 20.101, which limits the radiation exposure to the extremities of individuals. Specifically, you failed to evaluate the dose to the fingers and hands of student nuclear medicine technologists during their training program while working in your restricted areas.

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

Pursuant to the provisions of 10 CFR 2.201, Walter Reed Army Medical Center is hereby required to submit to this office within thirty days of the date of 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. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated 29 JUN 1981

John D. Kinneman, Chief  
Materials Radiological Protection  
Section

*8107170020*  
*27pp*

Attached

☐ Appendix A  
☐ Appendix B  
☐ Appendix C  
☐ Memo

INSPECTION REPORT NO. 81-01

Walter Reed Army Med. Center  
Nephty the Army  
Washington, D. C. 2012.

Licensee contact: James Hafford Telephone no. 301-427-5161  
1/8 2/7/79.

License no. 08-173802. Last amendment and date: 48 - 21.1.11

Category: G1, and Priority: 3, as of last amendment.

Category: \_\_\_\_\_  
 Inspection date(s): 10/2-4/81 Type of inspection: Random  
Unannounced

### SUMMARY OF FINDINGS AND ACTION

[ ] No noncompliance, clear 591 issued

☒ Noncompliance, Appendix A

[ ] Action on previous noncompliance, Appendix B

- [ ] Noncompliance, 591 issued
- [ ] Regional action                      Hq action
- [ ] Supplemental info, Appendix C

### RECOMMENDATIONS

See basis in Appendix C or attached memo.

[ ] Change Category to:

[ ] Change Priority to: \_\_\_\_\_

☒ Next inspection date:

PERSONS CONTACTED

\* James Stafford <sup>assist R.P.O.</sup> L.P. - Rad Mat Control Branch.  
 \* Capt. D. Stevenson <sup>R.P.O.</sup> Various research issues & health physics personnel  
 \* Capt. Yipin <sup>assist R.P.O.</sup> operations Branch \* Col. Meyer <sup>clinical dept. with me</sup> with the meyer  
Sp. H. Ydering <sup>chief tech. services</sup> \* Anjani <sup>stem cell lab</sup> commanding officer  
Douglas VanDiestrand <sup>MD - chemist</sup> mid dept.  
Ronald Doering <sup>MD - Brachytherapy</sup> Dept.  
 Inspector: J. M. Ginniss  
 Approved: J. Lowell for (K)

6/26/81  
6-12-81

Date: \_\_\_\_\_

License No: \_\_\_\_\_

Residence: \_\_\_\_\_

Inspection Items	Scheduled for Inspection	Post-Inspection Status	Module No.	766 Time Info
Management Meeting - Entrance and Exit Interviews (Required)	✓		30703B	1/2
Program Requirements, MC 2860 (Required)	✓		78710B	<del>12</del>
Followup on Noncompliance and Deviations	✓		92702B	1/4
Independent Inspection Effort (Required)	✓		92706B	6
Transportation	✓		86740B	1 1/2
Licensee Event Followup			92700B	
Followup on Inspector-Identified Problems			92701B	
IE Bulletin/Immediate Action Letter Followup			92703B	
Followup on Headquarters Requests			92704B	
Followup on Regional Requests			92705B	
Inspector Dispatched to Site			93700B	
Followup on Significant Event Occurring During Inspection			93701B	
Initial Management Meeting			38800B	

INSPECTION REPORT NUMBER                     

## AREAS INSPECTED AND FINDINGS

Licensee:                                      License no:                      Amendment no:                     

INSPECTION ITEMS	CRITERIA	FINDING
		<u>C</u>

1. Organization

Structure of organization as described in requirements?

Lic Cond           

NOTES &amp; REMARKS:

2. Licensee internal auditsLic Cond 2B

Scope and frequency of audits as required?  
 Conducted by appropriate persons? Records maintained? Reviewed by management?  
 Deficiencies identified & corrected?

*semiannual by hp office  
 - monthly visits on listed  
 informal bases.*

NOTES &amp; REMARKS:

3. Training and qualification of personnelLic Cond 23

Training & retraining conducted as required?  
 Written & oral exams conducted? Examination results reviewed by management?  
 Instructions to workers per 19.12?

19.12

NOTES &amp; REMARKS:

*ongoing training program  
 for new personnel - RAMP users  
 as well as ancillary staff.*

4. Radiation protection proceduresLic Cond 23

Procedures available and implemented? Identify radiopharmaceutical and dose(s)? Cover handling of patients receiving therapeutic doses? Cover handling of cadavers?

Emergency procedures for spills, etc?  
 Personnel understand procedures?

NOTES &amp; REMARKS:

*h.p. office tech. performs  
 decontamination when  
 identified.*

INSPECTION REPORT NUMBER \_\_\_\_\_

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
5. <u>Use of materials</u>	Lic Cond <u>23</u>	<u>C</u>
Procurement and use as required?	yes - appropriate for human use. not FDA approved drugs on hand.	
Special tests (moly breakthrough, leak tests, etc) required?	yes.	
Dose calibration checks performed?	duty - 2 sources.	
Posting & labeling as required?	yes	20.203
NOTES & REMARKS:		
6. <u>Storage of materials</u>	20.207	<u>C</u>
Material secured in both restricted and unrestricted areas? Adequately?		
NOTES & REMARKS:	all laboratories locked after hours & in controlled access remaining of time -	
7. <u>Facilities</u>	Lic Cond <u>23</u>	<u>C</u>
As described in lic cond or application?		
Any changes made? Adequacy?		
NOTES & REMARKS:		
8. <u>Instruments</u>	Lic Cond <u>23</u>	<u>C</u>
Survey meters & instruments adequate for program?		
Instruments & meters operable? Calibrated?		
Calibration adequate?		
NOTES & REMARKS:	at present, using Dialtex Physics Company in Rockville, MD. - calibration of all instruments quarterly all meters observed at JFZ AMC were operable & were calibrated by JFZ AMC	



## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
		<u>C</u>

## 9. Receipt and transfer of material

Written procedures for pickup, receiving, opening packages? 20.205  
 Survey of packages when received? 20.205(c)(1)  
 Records of survey of packages? 20.401(b)  
 Transfer of materials proper? Transfer records maintained? 30.41, 30.51  
 Authorized containers used? Shipping papers & package labels proper for packages on hand? 71.5

## NOTES &amp; REMARKS:

RAM's off for weekends delivered to rectly office who immediately takes it to H.P. storage area. H.P. performance of surveys adequate.

## 10. Personnel protection - external

Personnel monitoring controls adequate?  
 Exposures minimized?  
 Exposure records (NRC-4 or 5) maintained?  
 Available for employee review?  
 Surveys conducted? Adequate?  
 Records of monitoring, surveys?  
 Levels in unrestricted areas within limits?

## NOTES &amp; REMARKS:

ALARA program has been implemented as of 8/80. all aspects seem to be running smoothly & investigation etc.

nucl med students only WB wrist no extremities have been evaluation made.  
 20.101, 20.202  
 20.102(b), 20.401(a)  
 20.201 - weekly nucl med monthly lab  
 20.401 - hp office  
 20.1, 20.105 yrs

## 11. Personnel protection - internal

Airborne concentrations in restricted areas? 20.103  
 Exposures to minors? 20.104  
 Posting of airborne radioactivity areas? 20.203(d)  
 Survey, monitoring adequate for airborne radioactivity, surface contamination? Records maintained? 20.201  
 20.401

## NOTES &amp; REMARKS:



INSPECTION REPORT NUMBER \_\_\_\_\_

Page 6 of \_\_\_\_\_

787103 - Medical

## AREAS INSPECTED AND FINDINGS

Licenses: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
-----------------	----------	---------

12. Effluent controls, waste disposal

Release of effluents controlled?

20.106, 20.303

Waste disposals controlled?

20.301, 20.303, 20.304, 20.305

Procedures, records maintained?

20.401, Lic Cond \_\_\_\_\_

Surveys made? Adequate?

20.401

## NOTES &amp; REMARKS:

effluent monitoring performed - weekly of room with  
conditions performed via experiment for weather zone  
& monthly for effluent release to unrestricted areas.

13. Notifications and reports

To individuals.

19.13

Overexposures, excessive levels & concentrations,  
incidents.

20.403, 20.405

Personnel exposures and monitoring, termination  
reports.

20.407; 20.408

Theft or loss of licensed material.

20.402

## NOTES &amp; REMARKS:

14. Posting of noticesPart 20, license & documents, procedures,  
notice of violations posted?

19.11(a)

NRC-3 posted?

19.11(c)

## NOTES &amp; REMARKS:

15. Other license conditions

Lic

INSPECTION REPORT NUMBER                                 

AREAS INSPECTED AND FINDINGS

Amendment no:           

Licensee:                                                          License no:                                 

INSPECTION ITEMS	CRITERIA	FINDING
------------------	----------	---------

16. Confirmatory measurements

17. Independent inspection efforts

Accountability for emergency response  
Special Use Contaminations  
Waste  
Subordination  
etc. procedures

18. Incidents and events

Any incidents of misadministrations,  
contamination, etc, not otherwise  
covered by reports?

INSPECTION REPORT NUMBER \_\_\_\_\_

Page \_\_\_\_ of \_\_\_\_

APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

Basis for noncompliance \_\_\_\_\_

Reference \_\_\_\_\_

Report item \_\_\_\_\_

10 CFR 20.201(a)(2)(i)

Lic Cond \_\_\_\_\_

Type n/c \_\_\_\_\_

nu med students - have only been  
given wristfilm Badges to evaluate  
extremity dose - no calculation  
from wrist to finger exposure  
has been performed.

Report item \_\_\_\_\_

10 CFR \_\_\_\_\_

Lic Cond \_\_\_\_\_

Type n/c \_\_\_\_\_

Report item \_\_\_\_\_

10 CFR \_\_\_\_\_

Lic Cond \_\_\_\_\_

Type n/c \_\_\_\_\_

Report item \_\_\_\_\_

10 CFR \_\_\_\_\_

Lic Cond \_\_\_\_\_

Type n/c \_\_\_\_\_

Report item \_\_\_\_\_

10 CFR \_\_\_\_\_

Lic Cond \_\_\_\_\_

Type n/c \_\_\_\_\_

## APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

Identification and summary of action taken	Status
Report no: _____ Type n/c: _____ Describe: <u>4023 - authorization of use by committee</u>	OPEN
Action taken: <u>#131 #125 had in nuc. med. is not used for iodination work and has not been approved to do so by committee. Individual who performed the iodination was during January 1980 was in the process of moving his lab. but wanted to continue his work. He was stopped from using the hood as of the day of the last inspection.</u>	CLOSED
Report no: _____ Type n/c: _____ Describe: _____	OPEN
Action taken: _____	CLOSED
Report no: _____ Type n/c: _____ Describe: _____	OPEN
Action taken: _____	CLOSED
Report no: _____ Type n/c: _____ Describe: _____	OPEN
Action taken: _____	CLOSED
Report no: _____ Type n/c: _____ Describe: _____	OPEN
Action taken: _____	CLOSED

Action taken:

CLOSED

Report no:

Type n/c:

Describe:

Action taken:

OPEN

CLOSED

Report no:

Type n/c:

Describe:

Action taken:

OPEN

CLOSED

Report no:

Type n/c:

Describe:

Action taken:

OPEN

CLOSED

Report no:

Type n/c:

Describe:

Action taken:

OPEN

CLOSED

## APPENDIX C - SUPPLEMENTARY INFO \_\_\_\_\_

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

☐ Uncorrected/repeated noncompliance☐ Unresolved items☐ Unusual occurrence, conditions, etc☐ Inspector's comments☐ Basis for change of Category or Priority

- Health Physics Staff turnover has stabilized since 11/80. The decommissioned Reaction ~~Box~~ Bldg is to be used as rad waste storage facility. It is presently <sup>being</sup> used. Soon to install a ~~the~~ dry waste compactor by 7/81.
- Fort Detrick <sup>-02</sup> operation should be looked at on next inspection there ~~there~~
- concern about thyroid uptake consistently raised by McChesney. - HP staff has him under surveillance. to date this year a 50-70 mCi uptake/month have been average.
- Program in general is in good condition.

81-01 Inspection issued - Mamm Pest -- -- --  
 Fort Glenn Annex  
 Fort Meade.

## Amendment No:

Licensee:

License No:

Amendment No:

INSPECTION ITEMS

### CRITERIA

### FINDING

L1c Cond

## 1. Organization

Management organization?

Radiation Protection Organization?

Scope of Operation?

NOTES & REMARKS:

USAMRIID: This is a complete program located in Frederick with 1 Principle Investigator named by main WRAMC doc. Other designated use (X 20) are titled co-workers. Multiple isotopes are in use with limited authorized by main WRAMC license

L1c Cond

## 2. Licensee Internal Audits

Scope and frequency?

Management controls?

NOTES & REMARKS:

NPTech essentially <sup>coordinates and</sup> performs the duties of ~~such as~~ Rad. Safety. Monthly surveys and audits are performed by HP Office. RSC members sit on main WRAMC Rad. Safety Committee

### 3. Training and Instructions to Employees

Training program, scope and frequency,  
retraining?

Required tests administered; scores satisfactory?

Instructions to workers?

NOTES & REMARKS:

Lic Cond

19.12

#### 4. Radiation Protection Procedures

Operating & emergency procedures implemented? Lic Cond

## Security?

NOTES & REMARKS:

20.207

### 5. Materials, Facilities and Instruments

Authorized uses and quantities?

Restricted areas, posting requirements?

Survey instruments & dosimeters; operable,  
properly calibrated? ✓

NOTES & REMARKS:

Life 23rd

20.203



## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
6. <u>Receipt and Transfer of Materials</u>		<u>C</u>
Procedures implemented, adequate?	20.205, 71.51	
Transfer of byproduct material?	30.41	
Control of source material,	40.51, 40.64, 70.42, 70.51, 70.53, 70.54	
Labeling and packaging?	71.5, 49CFR 170-189	
Records of receipt, transfer, storage, survey, and monitoring?	30.51	
Procedures for pickup, receipt, monitoring of packages?	20.205(b)&(c)	

## NOTES &amp; REMARKS:

Possession Limits are dictated by WHAHC, however local  
NP technician controls materials receipts and inventory  
limits.  
H/C

7. Personnel Protection - External

Personnel monitoring control; minimize exposures, control of accumulated dose? ✓	20.101, 201.102, 20.202
Surveys conducted, adequate? ✓	20.201
Records of monitoring, surveys, disposals? ✓	20.401, Lic Cond _____
Levels in unrestricted areas?	20.1, 20.105

## NOTES &amp; REMARKS:

Field inspection of labs - evidence of eating, drinking &  
smoking observed. Also observed American breaks, both  
workers were observed during iodination procedure without  
wearing lab coat.  
C

8. Personnel Protection - Internal

Airborne concentrations in restricted areas?	20.103
Exposure of minors?	20.104
Posting of airborne radioactivity areas?	20.203
Survey, monitoring bioassay requirements; records? ✓	20.201, 20.401
Leak tests of sealed sources? ✓	Lic Cond _____

## NOTES &amp; REMARKS:

Sodium workers are scheduled monthly or quarterly  
for uptakes dependent upon quantities use

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
9. <u>Effluent Control, Waste Disposal</u>		<u>C</u>
Release of effluents?	20.106	
Waste disposal, proper packaging for shipment?	20.301, 20.303, 20.304, 20.305	
Procedures, records?	20.401, Lic Cond _____	
NOTES & REMARKS: <i>Presently, all waste is disposed of thru FH Detrick Science</i>		
10. <u>Transportation</u>		<u>C</u>
Management controls, audits?	49 CFR 173.393-5; 10 CFR 71	
Selection of packaging?	49 CFR 172, 173	
Preparation of packages for shipment? Filling	49 CFR 172.300	
and loading, closing, liquids?	49 CFR 172.402, 403	
Markings & labelling?	49 CFR 173.393	
Monitoring?		
Shipping papers, loading and placarding of vehicles?	49 CFR 172.200	
Reports of Incidents?	49 CFR 171.15, 171.16	
Training program?		
Examination of packages?		
NOTES & REMARKS:		
11. <u>Notifications and Reports</u>		<u>C</u>
To individuals?	19.13	
Overexposures, excessive levels and concentrations, incidents?	20.403, 20.405	
Personnel exposures and monitoring, termination reports?	20.407, 20.408	
Theft or loss of licensed materials?	20.402	
NOTES & REMARKS:		

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
12. <u>Posting of Notices</u>		<u>c</u>
Part 20, license & documents, procedures, notice of violations?	19.11(a)	
NRC-37	19.11(c)	
NOTES & REMARKS:		

13. Environmental Monitoring Program
- Implementation of program, scope and frequency as required?
- Records maintained, reviewed by management?
- NOTES & REMARKS:

Lic Cond \_\_\_\_\_ a

14. Emergency Preparedness
- Procedures available for incidents and accidents?
- Training for personnel; coordination with supporting groups and agencies?
- NOTES & REMARKS:

Lic Cond \_\_\_\_\_ a

15. Other License Conditions

NOTES &amp; REMARKS:

INSPECTION REPORT NUMBER \_\_\_\_\_

Page \_\_\_\_ of \_\_\_\_

77710B - Industrial - Academic

AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
-----------------	----------	---------

16. Confirmatory Measurements

Licensee's surveys verified on sampling basis? 201.105, 20.201

NOTES & REMARKS:

NRC Instrument: \_\_\_\_\_ Calibration due date: \_\_\_\_\_

17. Independent Inspection Effort

NOTES & REMARKS:

INSPECTION REPORT NUMBER \_\_\_\_\_

APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_

Reference	Basis for noncompliance
-----------	-------------------------

Report item <u>A.</u>	<i>Lab coats not worn Eating &amp; Drinking &amp; Smoking in labs</i>
10 CFR _____	
Lic Cond <u>19</u>	
Type n/c _____	

Report item _____
10 CFR _____
Lic Cond _____
Type n/c _____

Report item _____
10 CFR _____
Lic Cond _____
Type n/c _____

Report item _____
10 CFR _____
Lic Cond _____
Type n/c _____

Report item _____
10 CFR _____
Lic Cond _____
Type n/c _____

Report item _____
10 CFR _____
Lic Cond _____
Type n/c _____

APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licenses: \_\_\_\_\_

License no: \_\_\_\_\_

Status

Identification and summary of action taken

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describes: \_\_\_\_\_

OPEN

Action taken: \_\_\_\_\_

CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describes: \_\_\_\_\_

OPEN

Action taken: \_\_\_\_\_

CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describes: \_\_\_\_\_

OPEN

Action taken: \_\_\_\_\_

CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describes: \_\_\_\_\_

OPEN

Action taken: \_\_\_\_\_

CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describes: \_\_\_\_\_

OPEN

Action taken: \_\_\_\_\_

CLOSED



INSPECTION REPORT NUMBER \_\_\_\_\_

APPENDIX C - SUPPLEMENTARY INFORMATION

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_

- ☐ Uncorrected/repeated noncompliance
- ☐ Unusual occurrence, conditions, etc
- ☐ Basis for change of Category or Priority

- ☐ Unresolved items
- ☒ Inspector's comments

USAMRIID is the Superior Disease R & D arm of the WRAMC. The program is large and active. Site RPO & NPTak work cooperatively to manage a fairly good program. Some areas of concern is the poor housekeeping in some labs and the controls over civilian and army personnel

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
6. <u>Receipt and Transfer of Materials</u>		<u>C</u>
Procedures implemented, adequate?	20.205, 71.51	
Transfer of byproduct material?	30.41	
Control of source material,	40.51, 40.64, 70.42, 70.51, 70.53, 70.54	
Labeling and packaging?	71.5, 49CFR 170-189	
Records of receipt, transfer, storage, survey, and monitoring?	30.51	
Procedures for pickup, receipt, monitoring of packages?	20.205(b)&(c)	

## NOTES &amp; REMARKS:

Possession limits are dictated by WRAPAC, however local  
HP technician controls materials receipts and inventory  
limits.

H/C

7. Personnel Protection - External

Personnel monitoring control; minimize exposures, control of accumulated dose? ✓	20.101, 201.102, 20.202
Surveys conducted, adequate? ✓	20.201
Records of monitoring, surveys, disposals? ✓	20.401, Lic Cond _____
Levels in unrestricted areas?	20.1, 20.105

## NOTES &amp; REMARKS:

Field inspection of labs - evidence of eating, drinking &  
smoking observed. Also observed American breakfast, both  
workers were observed during iodination procedure without  
wearing lab coat.

C8. Personnel Protection - Internal

Airborne concentrations in restricted areas?	20.103
Exposure of minors?	20.104
Posting of airborne radioactivity areas?	20.203
Survey, monitoring bioassay requirements; records? ✓	20.201, 20.401
Leak tests of sealed sources? ✓	Lic Cond _____

## NOTES &amp; REMARKS:

Sodium workers are scheduled monthly or quarterly  
for uptakes dependent upon quantities use

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
9. <u>Effluent Control, Waste Disposal</u>		<u>C</u>
Release of effluents?	20.106	
Waste disposal, proper packaging for shipment?	20.301, 20.303, 20.304, 20.305	
Procedures, records?	20.401, Lic Cond _____	
NOTES & REMARKS:		
<i>Presently, all waste is disposed of thru FH Detrick Science</i>		
10. <u>Transportation</u>		<u>C</u>
Management controls, audits?		
Selection of packaging?	49 CFR 173.393-5, 10 CFR 71	
Preparation of packages for shipment? Filling	49 CFR 172.173	
and loading, closing, liquids?	49 CFR 172.300	
Markings & labelling?	49 CFR 172.402, 403	
Monitoring?	49 CFR 173.393	
Shipping papers, loading and placarding of vehicles?	49 CFR 172.200	
Reports of Incidents?	49 CFR 171.15, 171.16	
Training program?		
Examination of packages?		
NOTES & REMARKS:		
11. <u>Notifications and Reports</u>		<u>C</u>
To individuals?	19.13	
Overexposures, excessive levels and concentrations, incidents?	20.403, 20.405	
Personnel exposures and monitoring, termination reports?	20.407, 20.408	
Theft or loss of licensed materials?	20.402	
NOTES & REMARKS:		

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
12. <u>Posting of Notices</u>		<u>C</u>
Part 20, license & documents, procedures, notice of violations?	19.11(a)	
NRC-37	19.11(c)	
NOTES & REMARKS:		

13. Environmental Monitoring Program
- Implementation of program, scope and frequency  
as required?
- Records maintained, reviewed by management?
- NOTES & REMARKS:

Lic Cond \_\_\_\_\_

14. Emergency Preparedness
- Procedures available for incidents and accidents?
- Training for personnel; coordination with supporting  
groups and agencies?
- NOTES & REMARKS:

Lic Cond \_\_\_\_\_

15. Other License Conditions

NOTES &amp; REMARKS:

INSPECTION REPORT NUMBER \_\_\_\_\_

Page \_\_\_\_ of \_\_\_\_

77710B - Industrial - Academic

AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
-----------------	----------	---------

16. Confirmatory Measurements

Licensee's surveys verified on sampling basis? 201.105, 20.201

NOTES & REMARKS:

NRC Instrument: \_\_\_\_\_ Calibration due date: \_\_\_\_\_

17. Independent Inspection Effort

NOTES & REMARKS:

INSPECTION REPORT NUMBER \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: \_\_\_\_\_

License No: \_\_\_\_\_

Reference	Basis for noncompliance
Report item <u>A.</u>	<i>Lab coats not worn Eating &amp; Drinking &amp; Smoking in Labs</i>
10 CFR _____	
Lic Cond <u>19</u>	
Type n/c _____	
Report item _____	
10 CFR _____	
Lic Cond _____	
Type n/c _____	
Report item _____	
10 CFR _____	
Lic Cond _____	
Type n/c _____	
Report item _____	
10 CFR _____	
Lic Cond _____	
Type n/c _____	
Report item _____	
10 CFR _____	
Lic Cond _____	
Type n/c _____	
Report item _____	
10 CFR _____	
Lic Cond _____	
Type n/c _____	



## APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

Identification and summary of action taken

Status

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken:

OPEN

CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken:

OPEN

CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken:

OPEN

CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken:

OPEN

CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken:

OPEN

CLOSED

(July 82)

INSPECTION REPORT NUMBER \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

APPENDIX C - SUPPLEMENTARY INFORMATION

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_

- |                                                                   |                                                          |
|-------------------------------------------------------------------|----------------------------------------------------------|
| <input type="checkbox"/> Uncorrected/repeated noncompliance       | <input type="checkbox"/> Unresolved items                |
| <input type="checkbox"/> Unusual occurrence, conditions, etc      | <input checked="" type="checkbox"/> Inspector's comments |
| <input type="checkbox"/> Basis for change of Category or Priority |                                                          |

USAMRIID is the Infectious Disease R & D arm of the WRA MC. The program is large and active. Site RPO & NPTak work cooperatively to manage a fairly good program. Some areas of concern is the poor housekeeping in some labs and the controls over civilian and army personnel

INSPECTION PLAN AND REPORT NUMBER \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Plan Approved: \_\_\_\_\_

Date: \_\_\_\_\_

Licensee: \_\_\_\_\_

License No. \_\_\_\_\_

Inspection Items	Scheduled for Inspection	Post Inspection Status	Module No.
Management Meeting - Entrance and Exit Interviews (Required)			30703B <i>1N...</i>
Program ... rements, MC 2850 (Required)			77710B <i>8.5</i>
Followup on Noncompliance and Deviations			92702B
Independent Inspection Effort (Required)			92706B
Transportation			86740B