

Medical Center

50 Irving Street, NW.
Washington D.C. 20422



Veterans
Administration

File
In Reply Refer To:

March 1, 1983

Inspection No. 83-01

License No. 08-00942-04
08-00942-05 ✓

SNM-1805 ~~70-2199~~

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

THRU: Dr. James J. Smith, Director
Nuclear Medicine Service (115)
VA Central Office
Washington, D. C. 20420

Dear Mr. Martin:

I have received your letter regarding the above referenced inspection with the Notice of Violations. I request that you extend the response time by two weeks. This would change the response date from March 7, 1983 to March 21, 1983.

Sincerely yours,

to Joseph A. GAVAZZI
J. A. GAVAZZI
Medical Center Director

8506110469 850109
PDR FOIA
ENGEL84-789 PDR

FEB 7 1983

Docket Nos.: 30-00123
30-01314
70-02199

License Nos.: 08-00942-04
08-00942-05 ✓
SNM-1605

Veterans Administration Medical Center
ATTN: Mr. A. A. Gauazzi
Director
50 Irving St. N.W.
Washington, D.C. 20422

Gentlemen:

Subject: Inspection No. 83-01

This refers to the routine safety inspection conducted by Messrs. J. Nicolosi and S. Jones of this office on January 5, 1983 of activities authorized by NRC License Nos. 08-00942-04, 08-00942-05 and SNM-1605 and to the discussions of our findings held by Mr. Nicolosi with Ms. Shepherd and other 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 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.

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Based on the results of this inspection, it appears that certain 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 violation has been categorized by severity level in accordance with the NRC Enforcement policy (10 CFR 2, Appendix C) published in the Federal Register Notice (47 FR 9987) dated March 9, 1982. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

Item C in the Notice of Violation enclosed with this letter was identified during a previous inspection of your licensed activities on March 11, 1980, and was documented in the enclosure to our letter dated March 28, 1980. Your letter to this office dated April 11, 1980 stated that the use of syringe shields had been mandated by the Radiation Safety Officer and the Chief of the Nuclear Medicine Service. From our January 5, 1983 inspection it appears

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FEB 7 1983

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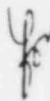
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In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

Your cooperation with us in this matter is appreciated.

Sincerely,

Original Signed By:
John D. Kinneman

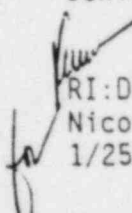
 Thomas T. Martin, Director
Division of Engineering and
Technical Programs


Enclosure: Appendix A, Notice of Violation

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

James J. Smith, M.D.
Director, Nuclear Medicine Service (115)
VA Central Office
Washington, D.C. 20420

bcc w/o encl:
Region I Docket Room (with concurrences)
Senior Operations Officer (w/o encl.)

 RI:DETP
Nicolosi/nm
1/25/83

 RI:DETP
Kinneman
2/4/83

FEB 7 1983

APPENDIX A
NOTICE OF VIOLATION

Veterans Administration Medical Center
Washington, D.C.

Docket No. 30-01314
License No. 08-00942-05

As a result of the inspection conducted on January 5, 1983, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

A. 10 CFR 20.201(b), "Surveys", requires that each licensee make such surveys as may be necessary 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.

1. Contrary to the above, as of January 5, 1983, surveys (evaluations) were not made to assure compliance with that part of 10 CFR 20.101 which limits the dose to the extremities of individuals. Specifically, personnel monitoring was not provided to evaluate the dose to the extremities of student nuclear medicine technologists working in the restricted areas. In addition, no evaluation was made of the radiation dose to the hands and fingers of personnel who inject patient doses and whose TLD finger badges were not processed for December 1980, May 1981, January 1982 and May 1982.

2. Contrary to the above, as of January 5, 1983, surveys were not made to determine that individuals who handled significant quantities of iodine-125 were not exposed to airborne concentrations exceeding the limits specified in 10 CFR 20.103. Specifically, surveys (evaluations, including air monitoring and thyroid monitoring where applicable) were not made during an iodination using of 10 millicuries of iodine-125 on or after July 15, 1982.

These are Severity Level IV violations. (Supplement IV)

B. 10 CFR 20.102(a) requires that, for individuals first entering the restricted area, the occupational dose received at other facilities in the current calendar quarter be determined.

Contrary to the above, as of January 5, 1983, the occupational dose for the current calendar was not determined for students who work part-time in the restricted area and part-time at other facilities where licensed materials are used.

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

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12pp.

FEB 7 1983

C. Condition 21 of License No. 08-00942-05 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated December 22, 1978.

1. Items A.4.b and c of Section II, page 14, of the "Radiation Safety Guide for Radioisotope Use" submitted with this application, requires that protective barriers and other shields be used whenever possible and that mechanical devices be used whenever their aid will assist in reducing exposures.

Contrary to the above, as of January 5, 1983, when technicians prepared unit doses of technetium-99m products, they failed to use a syringe shield, a device which reduces exposure.

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

2. Item 17.a, page 19, of this application requires the measurement of radiation levels with a survey meter in laboratories where gamma-emitting radioisotopes are used.

Contrary to the above, as of January 5, 1983, survey of radiation levels in Room IF-137 had not been made. The inspector identified gamma radiation levels of approximately 5 milliroentgens per hour on a absorbent pad in this area.

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

3. Item K, pages 11 and 12, of the "Radiation Safety Guide for Radioisotope Use" submitted with this application requires a monthly inventory record of use of radioisotopes.

Contrary to the above, as of January 5, 1983, no record of inventory and use was maintained for 10 millicuries of iodine-125 received on July 15, 1982 and for other licensed materials received when there was no Radiation Safety Officer.

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

Pursuant to the provisions of 10 CFR 2.201, the Veterans Administration Medical Center, Washington, D.C., is hereby required to submit to this office within thirty days of the date of the letter which transmitted 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. Where good cause is shown, consideration will be given to extending this response time.

LICENSE NO: 08-00942-05

DOCKET NO. (s) 30-01314
08-00942-05
70-02199

PAGE _____ OF _____

ATTACHED

- ☐ Appendix A
☐ Appendix B
☐ Appendix C
☐ Memo

INSPECTION REPORT NO. 83-01 Veterans Administration Medical Center
50 Irving St N.W.
Washington DC

LICENSEE CONTACT: John Bowman RSO

Telephone No: 745-8390
8 ~~89-1028~~

LICENSE NO: 08-00942-05
SNM- ~~1008~~ 1605

CATEGORY G1 PRIORITY: III

CATEGORY _____ PRIORITY: _____

CATEGORY _____ PRIORITY: _____

INSPECTION DATE (s): 1/5/83

TYPE OF INSPECTION: ☐ SPECIAL ☐ ANNOUNCED
☐ ROUTINE ☐ UNANNOUNCED
☐ DAYSHIFT
☐ OTHER

SUMMARY OF FINDINGS AND ACTION

- ☐ NO NONCOMPLIANCE, CLEAR 591 ISSUED
☒ NO NONCOMPLIANCE, LETTER
☐ NONCOMPLIANCE, APPENDIX A

- ☒ ACTION ON PREVIOUS NONCOMPLIANCE, APPENDIX B
☐ NONCOMPLIANCE, 591 ISSUED
☒ SUPPLEMENTAL INFO, APPENDIX C

RECOMMENDATIONS
SEE BASIS IN APPENDIX C

☐ CHANGE PRIORITY TO: _____

- ☐ CHANGE CATEGORY TO: _____
☐ NEXT INSPECTION DATE: 3/7/84

PERSONS CONTACTED

Richard Bates M.D. Acting Chairman RSC
John Bowman RSO
Lue Gene Rusk NMT
Julie Ash NMT
Thomas Tran NMT
Other members of NM staff
Sam Wilkins M.D. Research.
Colleen Shepherd - Admin Asst

INSPECTOR: James F. Nicolosi
APPROVED: [Signature]

1/11/83

INSPECTION PLAN AND REPORT NUMBER _____

Page _____ of _____

Plan Approved: _____

Date: _____

License No. _____

Licensee: _____

Inspection Items	Scheduled for Inspection	Post Inspection Status	Module No.
Management Meeting - Entrance and Exit Interviews (Required)	/	/	30703B
Program Requirements, MC 2860 (Required)	/	/	78710B
Followup on Noncompliance and Deviations	/	/	92702B
Independent Inspection Effort (Required)	/	/	92706B
Transportation			86740B

(July 82)

Page ____ of ____

INSPECTION REPORT NUMBER _____

78710B - Medical

AREAS INSPECTED AND FINDINGS

Licensee: _____ License No: _____ Amendment No: _____

INSPECTION ITEMS	CRITERIA	FINDING
1. Organization Structure of organization as described in requirements? Scope of Program? Patient load? 700 Bed Hospital - 150-200 pt/monthly NOTES & REMARKS: Thyroid Rx - 1/yr. 1 indication/monthly research lab 3 XE-133 weekly	Lic Cond _____ Chairman of RSC (Dr Sauerbrunn) retired day prior to inspection - Dr Bates appointed acting chairman - VA will submit his credentials to act as chairman. Rad Safety Meeting Minutes (OK)	C
2. Licensee Internal Audits Scope and frequency of audits as required? Conducted by appropriate persons? Records maintained? Reviewed by management? Deficiencies identified and corrected? NOTES & REMARKS:	Lic Cond _____ No formal requirement. informal periodic review by RSO	C
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? (OK) Authorized users? On license? Available in emergency? NOTES & REMARKS:	Lic Cond _____ ? of present RSO's qualifications to administer broad scope program 19.12 Issue is currently under consideration by MLS (Pat Vacker) conducted by RSO for staff on an ongoing BASIS	C
4. Radiation Protection Procedures Procedures available and implemented? Identify radiopharmaceutical and dose(s)? Cover handling of patients receiving therapeutic doses? Cover handling of cadavers? Close out Surveys on Patients receiving temporary implants? Emergency procedures for spills, etc? Personnel understand procedures? NOTES & REMARKS:	Lic Cond _____ ① Syringe shields not used during unit dose prep. Used at all other times 35.14 (b)(5)(v) Technical staff - use portable lead glass shields to protect from patient exposure. ② Research Lab - gamma emitter used - no restriction (Permit 13) survey - only contamination wipe test done to check shelf - method used is adequate	7/C

INSPECTION REPORT NUMBER _____

Page _____ of _____

787108 - Medical

AREAS INSPECTED AND FINDINGS

Licensee: _____ License No: _____ Amendment No: _____

INSPECTION ITEM	CRITERIA	FINDING
6. <u>Use of Materials</u>		<u>C</u>
Procurement and use as required? <u>OK</u>	Authorized form 35.14(b)	
& route of administration? <u>OK</u>	35.14(b)(4)	
Special tests (moly breakthrough, leak tests, etc) required? <u>OK</u>	35.14(b)(5)	
Inventory of brachytherapy sources? <u>none</u>		
Dose calibration checks performed? <u>OK</u>	20.203	
Posting & labeling as required? <u>OK</u>		
NOTES & REMARKS:		

6. <u>Storage of Materials</u>		<u>C</u>
Material secured in both restricted and unrestricted areas? Adequately? <u>OK</u>	20.207	
NOTES & REMARKS:		

7. <u>Facilities</u>	Lic Cond _____	<u>C</u>
As described in lic cond or application? <u>OK</u>		
Any changes made? <u>none</u> Adequacy? <u>OK</u>		
NOTES & REMARKS:		

8. <u>Instruments</u>	Lic Cond _____	<u>C</u>
Survey meters & instruments adequate for program? <u>OK</u>		
Instruments & meters operable? <u>OK</u> Calibrated? <u>OK</u>		
Calibration adequate? <u>OK</u>		
NOTES & REMARKS:		

by Ray Gronkel consultant Silver Springs, MD

AREAS INSPECTED AND FINDINGS

Licensee: _____ License No: _____ Amendment No: _____

INSPECTION ITEMS	CRITERIA	FINDING
<u>C</u>		
9. <u>Receipt and Transfer of Material</u>		
Written procedures for pickup, receiving, opening packages?	20.205	Packages which are exempt from survey as defined by Part 20 are visually inspected. No radiation survey or wipe test - as per license condition
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:		
<u>n/c</u>		
10. <u>Personnel Protection - External</u>		
Personnel monitoring controls adequate? Exposures minimized?	20.107, 20.202	1. Students from Prairie Grove Comm. College. a. no finger badge assigned b. no determination of prior dose 2. Staff - TLD finger badge reports 10/80, 5/81, 8/82, 5/82 missing No dose assigned for these periods 3. No thyroid bioassay for 10mCi I-125 rec'd 7-5-82
Exposure records (NRC-4 or 5) maintained? Available for employee review?	20.102(b), 20.401(a)	
Surveys conducted? Adequate?	20.201	
Records of monitoring, surveys?	20.401	
Levels in unrestricted areas within limits? (Particularly around nuclear med. hot lab rooms of brachytherapy patients)	20.1, 20.105	
NOTES & REMARKS:		
high - 1980 - WB 540 4490 mrem high - 1981 - 650 4450 mrem		
<u>n/c</u>		
11. <u>Personnel Protection - Internal</u>		
Airborne concentrations in restricted areas? (Xe-133, patients treated with I-131)	20.103	highest thyroid bioassay result for 125I was 10nCi - procedure reviewed (ok)
Exposures to minors?	20.104	
Posting of airborne radioactivity areas?	20.203(d)	
Survey, monitoring bioassay adequate for airborne radioactivity, surface contamination?	20.201	
Records maintained?	20.401	
Procedures for use of Xe-133 followed?		
NOTES & REMARKS:		
	3/wk (ok)	

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? (particularly Xe-133, radioiodine where used)	20.106, 20.33	<u>OK</u>
Waste disposals controlled?	20.301, 20.303, 20.304, 20.305	<u>yes - held for decay</u>
Procedures, records maintained?	20.401, Lic Cond _____	<u>OK</u>
Surveys made? Adequate?	20.401	<u>OK</u>
NOTES & REMARKS: "Diminimus" levels of $Cu + H_3$ in liquid scin media - collected and placed in Washington Hosp Center fuel tanks		

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	<u>none</u>
Misadministrations?	35.41-35.45	<u>7-2-81</u>
NOTES & REMARKS: Reviewed misadmin report - corrective action adequate		

14. Posting of Notices

Part 20, license & documents, procedures, notice of violations posted?	19.11(a)	
NRC-3 posted?	19.11(c)	
NOTES & REMARKS:		

15. Other License Conditions 10-20, 21, 22, 23

No record of inventory for shipment of
I-125 rec'd 7-15-82
54M1045 - 2 implants which
they are following - No new
patients OK

AREAS INSPECTED AND FINDINGS

Licensee: _____

License No: _____

Amendment No: _____

INSPECTION ITEMS

CRITERIA

FINDING

16. Confirmatory Measurementsg/m survey OK

NRC Instrument: _____

Model 14C

Calibration Due Date: _____

3/83

17. Independent Inspection Effort

① Survey meter functional and adequate.

② Security of RAM in Research Labs OK③ Personnel hand contamination check OK④ Tech staff noted to be wearing whole body badge + TLD finger badges
rubber gloves as necessary and lab coats.

⑤ Survey (g/m) of Research Labs (see # 4)

18. Incidents and EventsAny incidents of misadministrations,
contamination, etc., not otherwise
covered by reports?35.41 - 35.45
20.402, 20.403, 20.405

None noted or reported

INSPECTION REPORT NUMBER _____

APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

License No: _____

Licensee: _____

Basis for noncompliance

Reference
Report item 10
10 CFR 20.201 n/a
Lic Cond _____
Type n/c SLV

1. No lead apron close to hands of students who handle Ra no finger badge.
2. No lead apron close to hands for person who finger badge not processed 12/80, 5/81, 1/82, 5/82
3. No fingered bioassay for month of July 82 10mCi 1-125 Mecl 7-15-82

Report item 10
10 CFR 20.102(a)
Lic Cond _____
Type n/c SLV

No determination of prior dose for students who rotate thru program for minor going Comm College - these students rotate thru other hospitals in area.

Report item 4
10 CFR _____
Lic Cond 21
Type n/c JLH

Failure to use syringe shield during unit dose dispensing Nuc Med in per conversation to Asst Chief Tech.

Report item 21
10 CFR _____
Lic Cond 21
Type n/c SLV

Failure to perform G/M survey of lab where Ra source used Rm 137
Unidentified - reading of 5.0 R/hr on absorbent paper - researcher stated he had not done any work in two months.

Report item 15
10 CFR _____
Lic Cond 21
Type n/c X

No identity record of 1-125 10mCi Mecl 7-15-82

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

82)
REPAIR NUMBER _____

APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

License No: _____

Identification and summary of action taken _____ Status _____
Describe: Done Cal Tech Check

80-01 Type n/c: Inf Describe: Done Cal Tech Check
Record review and conversation with Asst Chief Tech indicate dose calibrator check done quarterly

OPEN
CLOSED

80-04 Type n/c: Inf Describe: No daily surveying
Record review and conversation with Asst Chief Tech indicate survey done daily

OPEN
CLOSED

80-01 Type n/c: Inf Describe: Failure to use eye shields
eye shields still not used in unit dose preparation

OPEN
CLOSED

Type n/c: _____ Describe: _____
OPEN
CLOSED

Type n/c: _____ Describe: _____
OPEN
CLOSED

Type n/c: _____ Describe: _____
OPEN
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

☒ (x) Inspector's comments

New RSO is still learning to put the program together
His lack of experience in real safety procedures
shows in some areas (etc Lab sampling (research),
dosimetry requirements)

MLB (Pat VACA) may downgrade program from
Broad scope to specific license. There is

still a question at this point of whether he can
adequately handle program even under specific license

- Spoke with administration at close out about
providing adequate coverage at all times

- Spoke c Pat VACA on 1/13/83 about
inspection results

Medical Center

50 Irving Street, NW.
Washington D.C. 20422



Veterans
Administration

File

In Reply Refer To:

March 1, 1983

Inspection No. 83-01

License No. 08-00942-04
08-00942-05
SNM-1005

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

THRU: Dr. James J. Smith, Director
Nuclear Medicine Service (115)
VA Central Office
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for A. A. GAVAZZI
Medical Center Director

James J. Smith MD
RECEIVED

MAR 14 1983
NUCLEAR MEDICINE SERVICE

Supl 8506110469

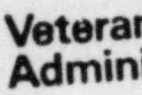
Medical Center

50 Irving Street, NW.
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File

File

In Reply Refer To:

 Veterans
Administration

March 1, 1983

Inspection No. 83-01

License No. 08-00942-04 ✓
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SNM-1605 70-2199

Mr. Thomas T. Martin, Director
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Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

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S. A. GAVAZZI
Medical Center Director

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Veterans Administration Medical Center
ATTN: Mr. A. A. Gauazzi
Director
50 Irving St. N.W.
Washington, D.C. 20422

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Your cooperation with us in this matter is appreciated.

Sincerely,

Original Signed By:
John D. Kinneman

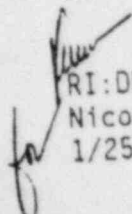
 Thomas T. Martin, Director
Division of Engineering and
Technical Programs


Enclosure: Appendix A, Notice of Violation

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

• James J. Smith, M.D.
Director, Nuclear Medicine Service (115)
VA Central Office
Washington, D.C. 20420

bcc w/o encl:
• Region I Docket Room (with concurrences)
• Senior Operations Officer (w/o encl.)

 RI:DETP
Nicolosi/nm
1/25/83

 RI:DETP
Kinneman
2/4/83

FEB 7 1983

APPENDIX A
NOTICE OF VIOLATION

Veterans Administration Medical Center
Washington, D.C.

Docket No. 30-01314
License No. 08-00942-05

As a result of the inspection conducted on January 5, 1983, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 20.201(b), "Surveys", requires that each licensee make such surveys as may be necessary 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.
1. Contrary to the above, as of January 5, 1983, surveys (evaluations) were not made to assure compliance with that part of 10 CFR 20.101 which limits the dose to the extremities of individuals. Specifically, personnel monitoring was not provided to evaluate the dose to the extremities of student nuclear medicine technologists working in the restricted areas. In addition, no evaluation was made of the radiation dose to the hands and fingers of personnel who inject patient doses and whose TLD finger badges were not processed for December 1980, May 1981, January 1982 and May 1982.
 2. Contrary to the above, as of January 5, 1983, surveys were not made to determine that individuals who handled significant quantities of iodine-125 were not exposed to airborne concentrations exceeding the limits specified in 10 CFR 20.103. Specifically, surveys (evaluations, including air monitoring and thyroid monitoring where applicable) were not made during an iodination using of 10 millicuries of iodine-125 on or after July 15, 1982.

These are Severity Level IV violations. (Supplement IV)

- B. 10 CFR 20.102(a) requires that, for individuals first entering the restricted area, the occupational dose received at other facilities in the current calendar quarter be determined.

Contrary to the above, as of January 5, 1983, the occupational dose for the current calendar was not determined for students who work part-time in the restricted area and part-time at other facilities where licensed materials are used.

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

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12pp

FEB 7 1983

C. Condition 21 of License No. 08-00942-05 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated December 22, 1978.

1. Items A.4.b and c of Section II, page 14, of the "Radiation Safety Guide for Radioisotope Use" submitted with this application, requires that protective barriers and other shields be used whenever possible and that mechanical devices be used whenever their aid will assist in reducing exposures.

Contrary to the above, as of January 5, 1983, when technicians prepared unit doses of technetium-99m products, they failed to use a syringe shield, a device which reduces exposure.

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

2. Item 17.a, page 19, of this application requires the measurement of radiation levels with a survey meter in laboratories where gamma-emitting radioisotopes are used.

Contrary to the above, as of January 5, 1983, survey of radiation levels in Room IF-137 had not been made. The inspector identified gamma radiation levels of approximately 5 milliroentgens per hour on a absorbent pad in this area.

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

3. Item K, pages 11 and 12, of the "Radiation Safety Guide for Radioisotope Use" submitted with this application requires a monthly inventory record of use of radioisotopes.

Contrary to the above, as of January 5, 1983, no record of inventory and use was maintained for 10 millicuries of iodine-125 received on July 15, 1982 and for other licensed materials received when there was no Radiation Safety Officer.

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

Pursuant to the provisions of 10 CFR 2.201, the Veterans Administration Medical Center, Washington, D.C., is hereby required to submit to this office within thirty days of the date of the letter which transmitted 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. Where good cause is shown, consideration will be given to extending this response time.

REGION I Form 198-E
(July 82)LICENSE NO: 08-00942-04DOCKET NO. (s) 30-00123

PAGE _____ OF _____

ATTACHED

- ☐ Appendix A
☐ Appendix B
☐ Appendix C
☐ Memo

INSPECTION REPORT NO. 83-01V.A. Med. Center.512 Irving St. N.W.Washington DC 20422LICENSEE CONTACT: Dr. Hungen M.D.

LICENSE NO: _____

Telephone No: _____

CATEGORY G3PRIORITY: V

CATEGORY _____

PRIORITY: _____

CATEGORY _____

PRIORITY: _____

INSPECTION DATE (s): 1/5/83

TYPE OF INSPECTION:

- ☐ SPECIAL ☐ ANNOUNCED
☒ ROUTINE ☒ UNANNOUNCED
☐ DAYSHIFT
☐ OTHER

SUMMARY OF FINDINGS AND ACTION

- ☒ NO NONCOMPLIANCE, ROL CLEAR ~~591~~ ISSUED
☐ NO NONCOMPLIANCE, LETTER
☐ NONCOMPLIANCE, APPENDIX A

- ☐ ACTION ON PREVIOUS NONCOMPLIANCE,
APPENDIX B
☐ NONCOMPLIANCE, 591 ISSUED
☐ SUPPLEMENTAL INFO, APPENDIX C

RECOMMENDATIONS
SEE BASIS IN APPENDIX C☐ CHANGE PRIORITY TO: _____

- ☐ CHANGE CATEGORY TO: _____
☐ NEXT INSPECTION DATE: 1/88

PERSONS CONTACTED

Dr. S. Hungen. Chief.Dr. K. Patel Rad-Physicist.A. Harmon Tech.INSPECTOR: [Signature]APPROVED: [Signature]1/11/83

INSPECTION PLAN AND REPORT NUMBER _____

Page _____ of _____

Plan Approved: _____

Date: _____

License No. _____

Licensee: _____

Inspection Items	Scheduled for Inspection	Post Inspection Status	Module No.
Management Meeting - Entrance and Exit Interviews (Required)	/	/	30703B
Program Requirements, MC 2860 (Required)	/	/	78720B
Followup on Noncompliance and Deviations			92702B
Independent Inspection Effort (Required)	/	/	92706B
Transportation			86740B

INSPECTION REPORT _____

787208 - Medical - Teletherapy

AREAS INSPECTED AND FINDINGS

Amendment No: _____

Licensee: _____ License No: _____

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

1. Organization

Lic Cond _____

C

Management organization?

Radiation protection organization?

Patient load?

NOTES & REMARKS:

20-25 pt daily / hand + neck mainly

2. Training and Instructions to Employees

Lic Cond _____

C

Training program, scope and frequency, retraining?

Required tests administered, scores satisfactory?

Instructions to workers?

19.12

NOTES & REMARKS:

3. Radiation Protection Procedures

Lic Cond _____

C

Operating and emergency procedures implemented; interlock failure, handling malfunctions during operations?

5-year maintenance?

Lic Cond 20

Emergency Procedures posted?

Lic Cond 16

Radiation room monitor mounted, operable? Order
Tested? Survey meter used when inoperable?

NOTES & REMARKS:

AREAS INSPECTED AND FINDINGS

Licensee: _____ License No: _____ Amendment No: _____

INSPECTION ITEM	CRITERIA	FINDING
4. <u>Materials, Facilities and Instruments</u>		<u>C</u>
Teletherapy unit location, interlock system operational, Required tests? <u>OK</u> . (every 6 months, records)	Lic Cond 10, 17, 19	
Access controls, posting of areas & rooms?	<u>OK</u> 20.203	
Survey instruments & dosimeters operable properly calibrated?	<u>OK</u> Lic Cond _____	
Patient viewing system?	Lic Cond 13	
NOTES & REMARKS:		
5. <u>Personnel Protection - External</u>		<u>C</u>
Personnel monitoring control; minimize exposures, control of accumulated dose?	20.101, 20.102, 20.202	
Surveys conducted following last source change? Sent to NRC? Adequate? <u>OK</u>	20.201 Lic Cond 18	
Levels in unrestricted areas?	20.1, 20.104	
Stops installed?	Lic Cond 15	
NOTES & REMARKS:		
6. <u>Leak Tests of Sources</u>	Lic Cond 14 <u>OK</u>	<u>C</u>
Performed by authorized persons & methods:		
Performed at 6-month (or other) interval?		
Records maintained; reports submitted of leaking sources; corrective action taken?		
NOTES & REMARKS:		

AREAS INSPECTED AND FINDINGS

Licensee: _____ License No: _____ Amendment No: _____

INSPECTION ITEM

CRITERIA

FINDING

7. Notifications and Reports

To individuals?

19.13

Overexposures, excessive levels, incidents?

20.403, 20.405

Personnel exposures and monitoring,
termination reports?

20.407, 20.408

Theft or loss of licensed material:

20.402

Misadministrations?

35.41 - 35.45

NOTES & REMARKS:

8. Annual Calibration

At required intervals?

35.21 (a)

Include all required tests? *yes*

35.21 (b)

Properly calibrated dosimetry system? *OK*

35.23 (a)

Performed by a qualified expert? *OK*

35.21 (e), 35.24

Decay corrections for interval not exceeding
1 month?

35.21 (d)

Records available?

35.25

NOTES & REMARKS:

9. Spot Check MeasurementsAt required intervals? *months*

35.22 (a)

Include all required tests? *yes*

35.22 (b)

Performed by qualified expert or reviewed by
qualified expert within 15 days? *yes*

35.22 (c), 35.24

Properly calibrated dosimetry system? *yes*

35.23 (b)

Records available?

35.25

NOTES & REMARKS:

10. Posting of NoticesPart 20, license & documents, procedures,
notice of violations?

19.11 (a)

NRC-3?

19.11 (c)

NOTES & REMARKS:

AREAS INSPECTED AND FINDINGS

Licensee: _____ License No: _____ /amendment No: _____

INSPECTION ITEM	CRITERIA	FINDING
11. <u>Other License Conditions</u>		<u>C</u>

NOTES & REMARKS:

12. Confirmatory Measurements

Output check?

Confirmation of condition 18 survey?

NOTES & REMARKS:

Did not do due to time
limitations - next inspection
should review

NRC Instrument: _____ Calibration Due Date: _____

13. Independent Inspection Effort

C
head check no area greater than 10 mR/hr.

NOTES & REMARKS:

INSPECTION REPORT NUMBER _____

APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: _____ License No: _____

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

Report item _____

10 CFR _____

Lic Cond _____

Type n/c _____

Clear

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 _____

INSPECTION REPORT NUMBER _____

Page _____ of _____

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

Clear on 8/9/82

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: _____

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

- () Unresolved items
(☒) Inspector's comments

Program under ~~day~~ clearly direction of Dr (PHD) Patel.
John Bowman comes monthly to do interlock
checks and other evaluations