

## NOTICE OF VIOLATION

Memorial Hospital of Sandusky County  
Fremont, Ohio

License No. 34-17809-01  
Docket No. 030-13360

During an NRC inspection conducted on November 30, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violations are listed below:

- A. 10 CFR 35.22(a)(1) requires that the membership of the Radiation Safety Committee consist of at least three individuals and include an authorized user of each type of use permitted by the license, the Radiation Safety Officer, a representative of the nursing service, and a representative of management who is neither an authorized user nor the Radiation Safety Officer.

Contrary to the above, from approximately November 1990 through August 21, 1992, the membership of the licensee's Radiation Safety Committee did not include an authorized user of each type of use permitted by the license. Specifically, the membership did not include an authorized user of radiopharmaceuticals for therapy, a use permitted by the license.

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

- B. 10 CFR 35.60(a) requires that a licensee keep syringes that contain byproduct material to be administered in a radiation shield. 10 CFR 35.60(c) requires, in part, that a licensee require each individual to use a syringe radiation shield when administering a radiopharmaceutical by injection, unless the use of the shield is contraindicated for that patient.

Contrary to the above, on November 30, 1992, the licensee did not keep a syringe containing 2.8 millicuries of technetium-99m to be administered in a radiation shield. In addition, during administration of the radiopharmaceutical, the licensee's nuclear medicine technologist did not use a syringe radiation shield for a syringe that contained 2.8 millicuries of technetium-99m, and the use of the shield was not contraindicated for that patient.

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

- C. 10 CFR 35.70(e) requires that a licensee survey for removable contamination once each week all areas where radiopharmaceuticals are routinely prepared for use, administered, or stored.

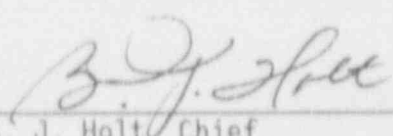
Contrary to the above, from at least November 28, 1990 through November 30, 1992, the licensee did not survey for removable contamination in the area of the hot lab routinely used to administer radiopharmaceuticals.

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

Pursuant to the provisions of 10 CFR 2.201, Memorial Hospital of Sandusky County is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, Illinois, 60137, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

DEC 28 1992

Dated \_\_\_\_\_

  
B. J. Holt, Chief  
Nuclear Materials Inspection  
Section 1