



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE
WALNUT CREEK, CALIFORNIA 94596-5368

DEC 17 1992

Docket No. 030-14529
License No. 53-18126-01
EA 92-221

Straub Clinic and Hospital, Inc.
888 South King Street
Honolulu, Hawaii 96813

Attention: Louise Liang, M.D.
Executive Vice President/CEO

SUBJECT: NOTICE OF VIOLATION
(NRC Inspection Report 92-01)

This refers to the inspection conducted by Messrs. Troy W. Pruett and David D. Skov of this office on November 3-6, 10 and 12, 1992. The inspection included a review of activities authorized for your facility in Honolulu, Hawaii. The results of the inspection, documented in NRC Inspection Report No. 92-01, were mailed to you in a letter dated November 24, 1992. Seven apparent violations of NRC regulatory requirements were identified by the NRC during this inspection. The violations, their causes, and your corrective actions were discussed with you during an enforcement conference on December 4, 1992. The results of the enforcement conference were documented in NRC Inspection Report 92-02, and are enclosed.

Based on the results of the inspection and the enforcement conference, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). Two of the four cited violations, failure to place radioactive waste in designated containers and failure to mathematically correct patient dosages for dose calibrator linearity errors that exceeded 10 percent are of particular concern because of their repetitive nature. We are specifically concerned about management's inability to take permanent corrective actions to prevent recurrence of these type of violations. Any similar violations in the future may result in additional enforcement action, including issuance of a civil penalty, or an order to modify, suspend or revoke your license.

Three additional violations, failure to properly survey waste prior to disposal, as required by 10 CFR 35.92(a)(2), failure of the Radiation Safety Officer to sign records of dose calibrator linearity tests, as required by 10 CFR 35.50 (e)(3), and failure to maintain complete records of waste disposal, as required by 10 CFR 35.92(b), are not being cited because the criteria specified in Section VII.B of the Enforcement Policy (10 CFR 2 Appendix C) were satisfied.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions you plan to prevent

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recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room. The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ross A. Scarano", written in a cursive style.

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

Enclosures:
Notice of Violation
NRC Inspection Report No. 92-02

CC:

J Martin, RV
 B Faulkenberry, RV
 M Blume, RV
 R Huey, RV
 R Scarano, RV
 F Wenslawski, RV
 G Yuhas, RV
 J Montgomery, RV
 T Pruett, RV
 J Lieberman, OE

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D. Skov *DS*
 12/16/92

REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY
YES / NO	YES / NO	YES / NO	YES / NO	YES / NO

T Pruett *TP*
 12/15/92

J Montgomery *JM*
 12/16/92

G Yuhas *GY*
 12/16/92

R Huey *RH*
 12/15/92

R Scarano *RS*
 12/17/92

REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY
YES / NO	YES / NO	YES / NO	YES / NO	YES / NO

SEND TO PDR
YES / NO