

## SAFETY INSPECTION

Page 1 of 1

SYNOR Corp.  
21681 Melrose Ave.  
Southfield MI 48075

## 2. REGIONAL OFFICE

REGION III  
U S NUCLEAR REGULATORY COMMISSION  
801 WARRENVILLE ROAD  
LISLE IL 60532-4351

1. NUMBER(S)

030-12332

4. LICENSE NUMBER(S)

04-26507-01MD  
21-171890 MD

5. DATE OF INSPECTION

5/22/96

JEE:

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

1. Within the scope of this inspection, no violations were observed.
2. The inspector also verified the steps you have taken to correct the violations identified during the last inspection. We have no further questions on those actions at this time.
3. During this inspection certain of your activities, as described below or attached, were in violation of NRC requirements. This form is a NOTICE OF VIOLATION, which is required to be posted in accordance with 10 CFR 19.11.

- ☐ A. \_\_\_\_\_ was not properly posted to indicate the presence of a \_\_\_\_\_, 10 CFR 20.203(b),(c),(d),(e) or 34.42.
- ☐ B. \_\_\_\_\_ of sealed sources were not performed at the proper frequencies. 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_.
- ☐ C. Records of \_\_\_\_\_ were not properly maintained. 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_.
- ☐ D. Documents were not properly posted or otherwise made available. 10 CFR 19.11.
- ☐ E. Reports or notification of \_\_\_\_\_ were not made in accordance with 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_.
- ☐ F. \_\_\_\_\_

9610090074 960927  
PDR FOIA  
LEE96-316 PDR

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I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified in the items checked above. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201. No further response will be submitted unless required by the NRC.

NATURE - LICENSEE

DATE

SIGNATURE - NRC INSPECTOR

DATE

5/27/96

## SAFETY INSPECTION

96-008

Page 1 of 1

## 1. LICENSEE

95 JUL 11 AM 10:35

Syncor International Corporation  
20001 Prairie Street  
Chatsworth, California 91311

## 2. REGIONAL OFFICE

REGION I  
U S NUCLEAR REGULATORY COMMISSION  
475 ALLENDALE ROAD  
KING OF PRUSSIA PA 19406-1415

## 3. DOCKET NUMBER(S)

030-33244

## 4. LICENSE NUMBER(S)

04-26507-01MD

## 5. DATE OF INSPECTION

June 18, 1996

## LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) 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:

- ☒ 1. Within the scope of this inspection, no violations were observed.
- ☐ 2. The inspector also verified the steps you have taken to correct the violations identified during the last inspection. We have no further questions on those actions at this time.
- ☐ 3. During this inspection certain of your activities, as described below or attached, were in violation of NRC requirements. This form is a NOTICE OF VIOLATION, which is required to be posted in accordance with 10 CFR 19.11.
- ☐ A. \_\_\_\_\_ was not properly posted to indicate the presence of a \_\_\_\_\_, 10 CFR 20.203(b),(c),(d),(e) or 34.42.
- ☐ B. \_\_\_\_\_ of sealed sources were not performed at the proper frequencies. 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_.
- ☐ C. Records of \_\_\_\_\_ were not properly maintained. 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_.
- ☐ D. Documents were not properly posted or otherwise made available. 10 CFR 19.11.
- ☐ E. Reports or notification of \_\_\_\_\_ were not made in accordance with 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_.
- ☐ F. \_\_\_\_\_
- A/45

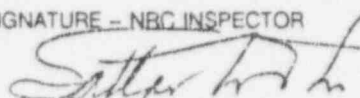
I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified in the items checked above. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201. No further response will be submitted unless required by the NRC.

SIGNATURE - LICENSEE

DATE

SIGNATURE - NRC INSPECTOR

DATE



6-24-96



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
511 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

June 26, 1996

EA 96-163  
Mr. Robert G. Funari  
President and Chief Operating Officer  
Syncor International Corporation  
20001 Prairie Street  
Chatsworth, California 91311

SUBJECT: NRC INSPECTION REPORT 030-33224/96-02

Dear Mr. Funari:

On April 19, 1996, the NRC conducted an inspection at Syncor International Corporation's (Syncor) Hummelstown, Pennsylvania pharmacy. The inspection findings were discussed with Mr. Robert Grobinski, Manager and Radiation Safety Officer of the facility, at the conclusion of the inspection. In addition, the inspection findings were discussed by Ms. Linda Howell of this office and Mr. John Kinneman of the NRC Region I office with Ms. Kathy Seifert and other members of your staff on April 22, 1996.

The inspection included a review of activities conducted under the license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of your license. The inspector initially identified a potential violation of 10 CFR 20.1904(b) and Condition 17.B of your NRC license. The issue involved a failure to remove or obliterate radiation labels affixed to syringes previously used to dispense unit dose radiopharmaceuticals prior to their disposal as ordinary waste (following decay-in-storage as required by your license). At the time of the inspection, the NRC was still reviewing, but had not yet approved, a request submitted by Syncor in January 1996 requesting exemption from the requirement to deface radiation labels specified in 10 CFR 20.1904(b).

However, upon further examination of the NRC Statements of Consideration for 10 CFR 20.1904(b) by the NRC Office of General Counsel, it was determined that Syncor's procedures for disposing of unit dose syringes, as documented in your January 19, 1996, letter and observed during the inspection, was not in violation of the above noted regulation and did not require exemption provided that certain controls were observed. This issue was discussed in detail in our letter dated May 22, 1996, responding to your January 18, 1996, exemption request. Accordingly, no violation is presently being issued regarding the above noted inspection finding.

As noted during the management meeting conducted in the NRC Region IV office on June 10, 1996, we are concerned, however, about your internal communication with pharmacy managers regarding the exemption request and requirements specified in 10 CFR 20.1904(b) during the period when this issue was under review by the NRC. Specifically, based on interviews with several members of your staff and a review of internal memos provided to the inspector, it appeared that instructions had been provided to pharmacy managers indicating that since the pending exemption request was expected to be granted by the

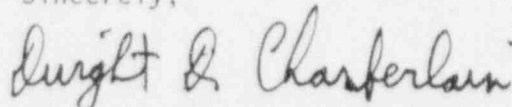
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IE47  
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NRC, it was acceptable to continue with the past practice of not defacing or removing radioactive labels from syringes prior to their disposal. This finding was of concern because your staff had previously committed to comply with 10 CFR 20.1904(b) during the licensing review process until an exemption was granted.

As noted during our meeting on June 10, the exemption review process is often complex and involves coordination among NRC staff in several offices, as well as between NRC regional staff and licensees. In order to ensure that communications regarding licensing and regulatory issues are timely and effective, and to avoid any misunderstandings, I encourage you and your staff to contact the Region IV staff members introduced during the June 10 meeting with any future questions that you may have. Timely and effective communication is vital not only among your corporate office and pharmacies but with the NRC staff as well.

Should you have any questions or comments concerning this letter, please contact me at (817) 860-8106.

Sincerely,



for Ross A. Scarano, Director  
Division of Nuclear Materials Safety

Docket: 030-33224  
License: 04-26507-01MD

cc:  
California Radiation Control Program Director

Syncor International Corp.

-3-

bcc:

DMB - Original (IE-07)

LJCallan

SJCollins

JLieberman, OE (O-7H-5)

DACool, NMSS (T-8F-5)

GFSanborn

GMVasquez

WLBrown

\*LLHowell

CWHehl, DNMS/RI

JKinneman, DNMS/RI

DBSpitzberg

CLCain

FAWenslawski

JLMontgomery

TTaylor, NMSS (T-8F-5)

\*NMI&FC/DB

\*MIS System

\*WCFO Region IV Files

\*RIV Materials File - 5th Floor

\*With IFS

DOCUMENT NAME: G:\NMIS\SYNCOR\SYNLABEL.LTR

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RIV:MB	C:NMI&FC/DB	DD:DNMS	D:DNMS	
JLMontgomery	LLHowell	DD:Gemberlain	RACarara	
06/25/96	06/25/96	06/26/96	06/26/96	

OFFICIAL RECORD COPY



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

July 18, 1996

EA 96-162

Mr. Robert G. Funari  
President and Chief Operating Officer  
Syncor International Corporation  
20001 Prairie Street  
Chatsworth, California 91311

SUBJECT: NRC INSPECTION REPORT 030-33224/96-03

Dear Mr. Funari:

On July 2, 1996, the NRC completed its review of information relating to delivery of radiopharmaceuticals from your Grand Rapids, Michigan facility to a specified individual at a parking lot in Kalamazoo, Michigan. This issue was previously discussed with you and your staff during a telephonic briefing on May 14, 1996, and during a management meeting on June 10, 1996.

Based on our review of information developed during an NRC investigation and discussions with you and your staff, the NRC has concluded that no violation of the license previously issued to the Syncor Grand Rapids pharmacy occurred. However, as discussed with you and your staff during the June 10 management meeting, we believe that the activity noted above is something which should have received greater management attention. This concern was also acknowledged by members of your staff who noted that because deliveries to locations other than a customer's primary location of use (i.e., hospital, clinic or physician office) is not routine, the Syncor staff at the Grand Rapids facility should have contacted the corporate radiation safety office.

As discussed with you on June 10, we expect that your pharmacy managers will consult with corporate management when questions arise that require interpretation of your license or evaluation to determine compliance. Therefore, you are encouraged to discuss this issue with Syncor staff to ensure that they are aware of the need to seek guidance from an appropriate level of management when decisions involving interpretation of your license or regulations are required.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room.

A/47

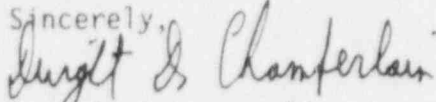


Syncor International Corp.

-2-

Should you or your staff have any questions concerning this letter, please contact Ms. Linda Howell at (817)860-8213.

Sincerely,



*for* Ross A. Scarano, Director  
Division of Nuclear Materials Safety

Docket: 030-33224  
License: 04-26507-01MD

cc:  
California Radiation Control Program Director

Syncor International Corp.

-2-

bcc:

DMB - Original (IE-07)

LJCallan

SJCollins

JP Lieberman, OE (O-7H-5)

DACool, NMSS (T-8F-5)

GFSanborn

GMVasquez

WLBrown

\*LLHowell

CPederson, DNMS/RIII

MPhillips, DNMS/RIII

DBSpitzberg

CLCain

FAWenslawski

\*JLMontgomery

TTaylor, NMSS (T-8F-5)

\*NMI&FC/DB

\*MIS System

\*WCFO Region IV Files

\*RIV Materials File - 5th Floor

OE EA: MS O-7H5

\*w/IFS Form

DOCUMENT NAME: G:\NMIS\SYNCOR\96-003.LLH

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RIV:C:NMI& FCBD	EO	DD:DNMS	D:DNMS	
LLHowell	GFSanborn	DBChamberlain	RAScarano	
07/16/96	07/17/96	07/18/96	07/18/96	

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

July 25, 1996

EA 96-104

Mr. Robert Funari, President and CEO  
Syncor International Corporation  
20001 Prairie Street  
Chatsworth, California 91311

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY -  
\$2,500  
(NRC Inspection 030-33224 (Formerly 030-15134)/96-001)

Dear Mr. Funari:

This letter refers to the NRC inspection conducted on February 26-27, 1996, at your facility in Pittsburgh, Pennsylvania, of activities authorized by NRC License No. 37-18467-01MD (which has now been replaced by License No. 04-26507-01MD). The inspection report was sent to you on April 10, 1996. During the inspection, the inspectors reviewed the circumstances associated with an event that occurred at your facility in August 1995 involving the contamination of one of your workers. Based on the NRC review of this event, a deliberate violation of NRC requirements has been identified. On April 22, 1996, a predecisional enforcement conference was conducted by the NRC Region I office with Mr. Jack Coffey and other members of the Syncor staff, to discuss the apparent violation, its causes, and your corrective actions. A copy of the enforcement conference report was forwarded to you on May 3, 1996.

The violation, which is described in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty, involved the use of radioactive material in a manner not authorized by the license. Specifically, an individual worker's lock and locker at the facility were deliberately contaminated with technetium-99m, which led to contamination of the worker after he returned to the facility following delivery of radiopharmaceuticals to various destinations. The individual had gone to his locker upon returning from the deliveries, and then proceeded to the restricted area. Upon exiting the restricted area, the individual performed a survey and identified that he was contaminated. Surveys also determined that his lock and locker were contaminated and that the delivery vehicle was not contaminated. After the individual reported this finding to his management, you subsequently performed an investigation, but were unable to determine who was responsible for the contamination.

After reviewing all available information about this event, we have concluded that the violation most likely was deliberate because of the amount of contamination that was concentrated on the lock, and the fact that the only other contamination at the facility correlated with the activities of the contaminated individual after his visit to the locker. Moreover, there was a lack of a more credible explanation for the contamination of the lock. Given the deliberate nature of the violation, and the resultant contamination of an individual worker, the violation is of significant concern to the NRC.

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C PDR

It is noteworthy that your company was cited in November 1994 for a deliberate violation in which a worker at your Kansas City facility deliberately used licensed material in a manner not authorized by the license. In that case, the individual sprayed byproduct material on two butterflies in the unrestricted area outside of the Kansas City facility. Although you viewed that event as significant and terminated the responsible individual's employment, you did not take any corporate-wide action at the time to inform managers and employees at your other facilities about the event and the significance of deliberate misuse of material, so as to prevent a recurrence at your other facilities. You were in the process of seeking consolidation of your NRC licenses at the time. Especially under those circumstances, NRC would have expected specific corporate-wide action to highlight the unacceptability of deliberate misuse of licensed material.

The staff at all of your facilities must recognize that the licenses issued to Syncor International Corporation entrust responsibility for radiation safety not only to the Radiation Safety Officer (RSO) and licensee management, but also to each individual employee. The NRC expects, in addition to effective oversight of licensed programs by Syncor management and radiation safety staff, that each employee fully understands and implements the conditions of the license. Incumbent upon each NRC licensee and each licensee employee is the responsibility to protect the public health and safety by ensuring that all requirements of the NRC license are met and any potential violations of NRC requirements are identified and corrected expeditiously. Deliberately circumventing such requirements is a serious offense that will not be tolerated by the NRC. Such acts can result in civil action against the individual by the NRC, including prohibition from any involvement in NRC-licensed activities, and may result in criminal prosecution by the Department of Justice. Given the deliberate nature of the violation in this case, the violation is classified at Severity Level III in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600.

In accordance with the Enforcement Policy, a base civil penalty in the amount of \$2,500 is considered for a Severity Level III violation. Although your facility has not been the subject of escalated enforcement actions in the past two years or two inspections, given the deliberate nature of the violation, the NRC considered whether credit was warranted for *Identification and Corrective Action* in accordance with the civil penalty assessment process in Section VI.B.2 of the Enforcement Policy. Since the event was identified by your staff and subsequently investigated, the NRC has determined that credit is warranted for your identification. Your corrective actions, which were described at the enforcement conference, included: (1) issuance of a memorandum, dated April 18, 1996, to all your employees regarding deliberate violations; (2) the prompt decontamination of the individual and control of the spread of contamination within the facility; (3) conduct of the investigation described in your records dated August 24 and 29, 1995, and November 29, 1995; (4) admonitions to the staff at the Pittsburgh pharmacy regarding adherence to requirements; and (5) distribution of a memorandum to all Syncor employees stating that deliberate misuse of any hazardous material is grounds for termination. Based on these actions, the NRC has determined that credit for your corrective action is also appropriate. Therefore, based

on the credit provided for identification and corrective action, a civil penalty normally would not be issued for this violation.

However, the Enforcement Policy provides that discretion may be exercised to assess a civil penalty notwithstanding the normal civil penalty assessment factors for cases involving willfulness. The willful action of a Syncor employee in causing radioactive contamination that could expose another individual cannot be tolerated by the NRC. Moreover, as noted above, this violation represents the second occurrence of deliberate misuse of licensed material within Syncor International Corporation. Therefore, a significant sanction is warranted to emphasize to the licensee and its employees that such actions are not acceptable. Based on these concerns, the NRC has determined that it is appropriate to exercise enforcement discretion, as permitted in Section VI: A.1 of the Enforcement Policy, to propose a base civil penalty of \$2,500.

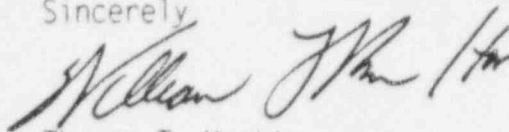
Therefore, to emphasize: (1) the significance of deliberate violations, and (2) the importance of aggressive action to prevent deliberate misuse of licensed material, I have been authorized, after consultation with the Director, Office of Enforcement, and the Commission, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) in the amount of \$2,500 for this Severity Level III violation.

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 have taken and any additional actions you plan to take to prevent recurrence. You also should describe your plans for ensuring that notice of significant occurrences at any of your facilities is disseminated promptly to employees at all of your facilities. Such dissemination is particularly important given the consolidation of all of your licensed activities under a single NRC license issued by the NRC Region IV office. 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, its enclosure, and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If 10 CFR 2.790 material is included in your response, the response must place brackets around the proprietary material. In addition, a nonproprietary version, leaving the brackets intact but deleting the material within the brackets, must be submitted to be placed in the PDR.

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 'Thomas T. Martin', with a stylized flourish at the end.

Thomas T. Martin  
Regional Administrator

Docket No. 030-33224 (Formerly 030-15134)  
License No. 04-26507-01MD (Formerly 37-18467-01MD)

Enclosure: Notice of Violation and Proposed Imposition of Civil Penalty

cc w/encl:  
Commonwealth of Pennsylvania  
State of California

Syncor International Corporation

DISTRIBUTION:

SECY

CA

PUBLIC

JTaylor, EDO

HThompson, DECS

JLieberman, OE

TMartin, RI

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FDavis, OGC

LChandler, OGC

CPaperiello, NMSS

DCool, NMSS

Enforcement Coordinators

RI, RII, RIII, RIV

LHowell, RIV

BBeecher, GPA/PA

GCaputo, OI

DBangart, OSP

LNorton, OIG

EJordan, AEOD

OE:Chron

OE:EA

DCS

Nuclear Safety Information Center (NSIC)

LAS:CNMS (RI)

DScenci, PAO-RI (2)

NUDOCS

EDO AND COMMISSION APPROVAL - 7/25/96 SEE SECY 96-153

RI:EO  
DHolody/mjc

4/21/96

RI:DRSS  
WHehl

4/22/96

RI:RC  
KSmith

5/1/96

RI:PA  
TMA

5/21/96

OE Via E-mail  
JLieberman

7/25/96

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a:PROP-SYN.



NOTICE OF VIOLATION  
AND  
PROPOSED IMPOSITION OF CIVIL PENALTY

Syncor International Corporation  
Pittsburgh, Pennsylvania

Docket No. 030-33224  
(Formerly 030-15134)  
License No. 04-26507-01MD  
(Formerly 37-18467-01MD)  
EA 96-104

During an NRC inspection conducted on February 26 - 27, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the Nuclear Regulatory Commission proposes to impose a civil penalty pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205. The particular violation and associated civil penalty are set forth below:

10 CFR 30.34(c) requires, in part, that each licensee shall confine his possession and use of byproduct material to the locations and purposes authorized in the license. Condition 9.F. of License No. 37-18467-01MD authorized the use of technetium-99m, a byproduct material, for dispensing and/or distribution of prepared radiopharmaceuticals to authorized recipients and for processing with reagent kits in preparing radiopharmaceuticals.

Contrary to the above, on August 10, 1995, the licensee did not confine its possession and use of byproduct material to the locations and purposes authorized by the license. Specifically, an unidentified licensee employee (or employees) deliberately used technetium-99m to contaminate a lock and locker located in the garage, an unrestricted area, and consequently to contaminate an individual worker at the facility, which are uses not authorized by the license.

This is a Severity Level III violation (Supplement VI)  
Civil Penalty - \$2,500

Pursuant to the provisions of 10 CFR 2.201, Syncor International Corporation (Licensee) is hereby required to submit a written statement or explanation to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, within 30 days of the date of this Notice of Violation and Proposed Imposition of Civil Penalty (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each alleged violation: (1) admission or denial of the alleged violation, (2) the reasons for the violation if admitted, and if denied, the reasons why, (3) the corrective steps that have been taken and the results achieved, (4) the corrective steps that will be taken to avoid further violations, and (5) 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. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Within the same time as provided for the response required above under 10 CFR 2.201, the Licensee may pay the civil penalty by letter addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, with a check, draft, money order, or electronic transfer payable to the Treasurer of the United States in the amount of the civil penalty proposed above, or the cumulative amount of the civil penalties if more than one civil penalty is proposed, or may protest imposition of the civil penalty in whole or in part, by a written answer addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission. Should the Licensee fail to answer within the time specified, an order imposing the civil penalty will be issued. Should the Licensee elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, in whole or in part, such answer should be clearly marked as an "Answer to a Notice of Violation" and may: (1) deny the violations listed in this Notice, in whole or in part, (2) demonstrate extenuating circumstances, (3) show error in this Notice, or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty.

In requesting mitigation of the proposed penalty, the factors addressed in Section VI.B.2 of the Enforcement Policy should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201, but may incorporate parts of the 10 CFR 2.201 reply by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of the Licensee is directed to the other provisions of 10 CFR 2.205, regarding the procedure for imposing a civil penalty.

Upon failure to pay any civil penalty due which subsequently has been determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234(c) of the Act, 42 U.S.C. 2282c.

The response noted above (Reply to Notice of Violation, letter with payment of civil penalty, and Answer to a Notice of Violation) should be addressed to: Mr. James Lieberman, Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region I, 475 Allendale Road, King of Prussia, PA 19406.



Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information by bracketing such information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public. In addition, a nonproprietary version must be submitted with the information in brackets redacted to be placed in the PDR.

Dated at King of Prussia, Pennsylvania  
this 25th day of July 1996



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV

Walnut Creek Field Office  
1450 Maria Lane  
Walnut Creek, California 94596-5368

August 1, 1996

Mr. David W. Pellicciarini, Health Physicist  
Syncor International Corporation  
20001 Prairie Street  
Chatsworth, California 91311

SUBJECT: NRC INSPECTION 030-33224/96-11

Dear Mr. Pellicciarini:

An NRC inspection was conducted June 18, 1996, at your Richmond, Virginia Pharmacy located at 1500-A Tomlynn Street. Enclosed is an NRC Form 591 describing the scope of the inspection and noting that no violations were observed.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room (PDR).

Should you have any questions concerning this inspection, please contact me at 510-975-0249.

Sincerely,

James L. Montgomery  
Senior Health Physicist  
Materials Branch

Docket No.: 030-33224  
License No.: 04-26507-01MD  
Enclosure: As stated

A/49

## SAFETY INSPECTION

Page 1 of 1

## 1. LICENSEE

Syncor International Corporation  
20001 Prairie Street  
Chatsworth, California 91311

## 2. REGIONAL OFFICE

REGION II  
U S NUCLEAR REGULATORY COMMISSION  
101 MARIETTA STREET NW SUITE 2900  
ATLANTA GA 30323

## 3. DOCKET NUMBER(S)

030-33224

## 4. LICENSE NUMBER(S)

04-26507-01MD

## 5. DATE OF INSPECTION

JUNE 18, 1996 OF  
1500-A TOMLYNN STREET  
RICHMOND, VA FACILITY

## LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) 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:

- ☒ 1. Within the scope of this inspection, no violations were observed.
- ☐ 2. The inspector also verified the steps you have taken to correct the violations identified during the last inspection. We have no further questions on those actions at this time.
- ☐ 3. During this inspection certain of your activities, as described below or attached, were in violation of NRC requirements. This form is a NOTICE OF VIOLATION, which is required to be posted in accordance with 10 CFR 19.11.
- ☐ A. \_\_\_\_\_ was not properly posted to indicate the presence of a \_\_\_\_\_ 10 CFR 20.203(b),(c),(d),(e) or 34.42.
- ☐ B. \_\_\_\_\_ of sealed sources were not performed at the proper frequencies. 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_.
- ☐ C. Records of \_\_\_\_\_ were not properly maintained. 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_.
- ☐ D. Documents were not properly posted or otherwise made available. 10 CFR 19.11.
- ☐ E. Reports or notification of \_\_\_\_\_ were not made in accordance with 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_.
- ☐ F. \_\_\_\_\_

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified in the items checked above. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201. No further response will be submitted unless required by the NRC.

SIGNATURE - LICENSEE

DATE

SIGNATURE - NRC INSPECTOR

Wade T. Loo *Wade T. Loo*  
Jose M. Diaz Velez *Jose M. Diaz Velez*

DATE

7/10/96

August 2, 1996

David Pellicciarini  
Program Manager, Health Physics  
Syncor International Corporation  
20001 Prairie Street  
Chatsworth, CA 91311

SUBJECT: NRC INSPECTION REPORT NO. 96-009

Dear Mr. Pellicciarini:

This refers to the inspection conducted on June 26-27, 1996 with continuing in-office review through July 18, 1996 of the Miamisburg, Ohio pharmacy. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. At the conclusion of the inspection, the findings were discussed with members of your staff.

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 with the conditions of your license. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, independent measurements and observation of activities in progress.

No violations of NRC requirements were identified during the course of this inspection.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practices," a copy of this letter will be placed in the NRC Public Document Room (PDR).

We will gladly discuss any questions you have concerning this inspection.

Original Signed by B.J. Holt

Sincerely,  
Nuclear Materials Inspection  
Branch 1

License No.: 04-26507-01MD  
Docket No.: 030-33224

bcc w/encl: PUBLIC  
D N

A/50