

NOTICE OF VIOLATION

Georgetown University Medical Center
3900 Reservoir Road, N.W.
Washington, D.C. 20007

Docket No. 030-01315
License No. 08-01709-04

During an NRC inspection conducted on July 23, 1996 - July 25, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy), NUREG 1600, the violations are listed below:

- A. 10 CFR 35.415(a)(4) requires, in part, that a licensee, promptly after implanting brachytherapy sources, survey the dose rates in contiguous unrestricted areas with a radiation measurement survey instrument to demonstrate compliance with the requirements of 10 CFR Part 20.

Contrary to the above, as of June 1996, the licensee did not survey the dose rates in unrestricted contiguous areas with a radiation measurement survey instrument to demonstrate compliance with the requirements of 10 CFR Part 20. Specifically, as of June 1996, the licensee implanted cesium-137 brachytherapy sources and did not measure the dose rate in contiguous patient rooms and unrestricted areas, to demonstrate that the dose rates were below limits described in 10 CFR 20 and license conditions.

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

- B. 10 CFR 35.21(a) requires that the licensee, through the Radiation Safety Officer, ensure that radiation safety activities are being performed in accordance with approved procedures. The licensee's procedures for training individuals working in or frequenting restricted areas are described in the application dated August 21, 1995, and were approved by License Condition No. 26.

Item 8 of application dated August 21, 1995 states, in part, that the training provided to persons working with radioactive materials includes appropriate radiation safety procedures.

Contrary to the above, as of July 23, 1996, the licensee, through its Radiation Safety Officer, did not ensure that radiation safety activities were being performed in accordance with the above procedures. Training provided to nuclear medicine technologists was inadequate. Specifically, the Nuclear Medicine Technologist working in the hot lab (a restricted area) was inadequately trained in radiation safety procedures for receipt of radioactive material surveys, and the proper use of survey meter operability check. In that, the hot lab technologist taped the survey meter check source to the front of the survey meter and proceeded to survey the radioactive material packages. When performing the survey at one meter, the technologist did not notice that the results could have been artificially elevated, due to the close proximity of other packages containing radioactive material. Another technologist was inadequately trained in the proper use of personnel dosimetry. In that, she wore her

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finger TLD dosimeter on the left finger where the right hand received the highest dose; thereby, giving an inadequate dose assessment to the right hand.

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

- C. Condition 26 of License No. 08-01709-04 requires that the licensee conduct its program in accordance with the statements, representations, and procedures contained in application dated August 21, 1995.

Item 2(c)(1) of Appendix C of application dated August 21, 1995, states, in part, that monitoring for radioactive contamination is required for labeled packages.

Contrary to the above, the licensee did not conduct its program in accordance with the statements, representations, and procedures contained in application dated August 21, 1995. Monitoring for radioactive contamination was not performed for labeled packages. Specifically, during the month of April 1996, several labeled packages were received in Nuclear Medicine, and the packages were not surveyed for removable surface contamination.

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

Pursuant to the provisions of 10 CFR 2.201, Georgetown University Medical Center is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. 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.

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 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.