

DEC 10 1996

Docket No. 030-31642

License No. 06-28502-01

Hugh S. Vine, M.D.
President
Jefferson X-Ray Group, Inc.
85 Seymour Street, Suite 200
Hartford, CT 06106

SUBJECT: INSPECTION NO. 030-31642/96-001

Dear Dr. Vine:

On October 1, 1996, Keith Brown of this office conducted a safety inspection at the above address of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. The findings of the inspection were discussed with Dr. Edward B. Cronin of your staff at the conclusion of the inspection.

During the inspection, the inspector questioned your use of a Caprac NaI(Tl) well counter to evaluate wipe samples taken during weekly surveys for removable contamination. The results reviewed by the inspector were in units of counts per minute, and the background was apparently evaluated over a narrower energy range than the sample. Subsequent to visiting your facility, the inspector reviewed specifications and operation of the Caprac device. When it finds no activity on a sample in the energy range used for the background, the device increases the energy range scanned, attempting to find other activity peaks. The device produces results in units of counts per minute only when it fails to find any peak resulting from activity on the sample. Should it detect a peak corresponding to any of the isotopes used at your facility, it would not scan higher energies looking for peaks and would produce a result in disintegrations per minute using the device's efficiency for that particular isotope. The device is sensitive enough to detect activity on the sample well below the regulatory limits and well below the trigger levels in your license. We, therefore, conclude that your procedure for surveying for removable contamination is acceptable.

The inspector also discussed with you the need to determine prior radiation doses received by individuals who are hired by your facility. Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed and categorizes each violation by severity level in accordance with the "General Statement of Policy and Procedure for

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H. S. Vine
Jefferson X-Ray Group, Inc.

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NRC Enforcement Actions," (Enforcement Policy), NUREG 1600. 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 taken and any additional actions you plan to prevent recurrence. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. 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.

Please use the enclosed self-addressed green envelope when you respond to this letter to assist us in the timely processing of your response. In accordance with Section 2.790 of 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 (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. 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. The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us is appreciated.

Sincerely,

ORIGINAL SIGNED BY:

John D. Kinneman, Chief
Nuclear Materials Safety Branch 2
Division of Nuclear Materials Safety

Docket No.: 030-31642
License No.: 06-28502-01

Enclosure:
Notice of Violation

cc w/enclosure:
State of Connecticut

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