

APPENDIX A

NOTICE OF VIOLATION

Mt. Auburn Hospital
Cambridge, Massachusetts 02138

Docket No. 030-01945
License No. 20-12063-01

As a result of the inspection conducted on June 13, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 71.5(a) requires that no licensee deliver any licensed material to a carrier for transport without complying with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation in 49 CFR Parts 170-189.

49 CFR 173.475(i) requires that prior to shipment of any package, the shipper shall ensure by examination or appropriate tests that external radiation and contamination levels are within the allowable limits specified in 49 CFR 172.403(b) and 49 CFR 173.433.

Contrary to the above as of June 13, 1985, packages containing radioactive wastes shipped to Nuclear Pharmacy, Inc., under a waste return program, had not been surveyed to assure that external radiation and contamination levels were within allowable limits.

This is a Severity Level IV Violation. (Supplement V)

- B. Condition 18 of License No. 20-12063-01 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in application dated June 23, 1983.

1. Item 14 of this application requires that packages containing radioactive material be opened in accordance with the procedures in Appendix F of Regulatory Guide 10.8, Revision 1.

Steps 2.c and 2.d of Appendix F require that, when opening packages in which licensed material has been received, the exposure rate 3 feet from the surface of the package and at the surface be measured and recorded.

Contrary to the above, as of June 13, 1985, the required procedures were not performed for all packages received since May 29, 1985.

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

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2. Item 17 of this application, requires that surveys be performed in accordance with the "Area Survey Procedures" in Appendix I of Regulatory Guide 10.8.

Item 1 of Appendix I requires that all elution, preparation and injection areas be surveyed daily. Item 3 of this appendix requires that weekly surveys include waste storage areas and all other laboratory areas.

Contrary to the above, as of June 13, 1985 daily and weekly surveys had not been performed since May 30, 1985.

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

Pursuant to the provisions of 10 CFR 2.201, Mt. Auburn Hospital is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.