

APPENDIX A

NOTICE OF VIOLATION

Christ Hospital
Jersey City, New Jersey 07306

Docket Nos. 30-2556
30-0372
License Nos. 29-12664-01
29-12664-02

As a result of the inspection conducted on June 27, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 20.105(b) requires that no licensee use licensed matter in such a way as to create in an unrestricted area from radioactive material radiation levels in excess of two millirems in any one hour.

Contrary to the above, on January 15, 1984, January 16, 1984, May 1, 1984, January 21, 1985 and June 12, 1985 radiation levels in excess of two millirems per hour existed in patient rooms adjacent to iodine-131 therapy patients.

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

- B. 10 CFR 20.201(b) requires such surveys as may be necessary to comply with the requirements of 10 CFR 20. 10 CFR 20.301 requires that no license dispose of licensed material except by certain specified procedures.

Contrary to the above, as of June 26, 1985, surveys were not performed to ensure that licensed material on alcohol swabs was not disposed of to the normal trash, a method not authorized by 10 CFR 20.301.

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

- C. Condition 18 of License No. 29-12664-01 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated February 24, 1984 and letter dated March 29, 1984.

1. Item 17-4 of an attachment to your letter dated March 29, 1984 requires that surveys and wipes of all elution, preparation and injection areas be conducted weekly. Item 17-3 of this attachment requires that the waste storage area will be surveyed weekly or more often if irregularities are found.

Contrary to the above, weekly surveys and wipes of elution, preparation and injection areas not performed during the weeks of October 26, 1984, December 9, 1984, December 30, 1984, January 20, 1985,

OFFICIAL RECORD COPY

DL CHRIST - 0005.0.0
09/20/85

8510070289 850930
REG1 LIC30
29-12664-01 PDR

February 17, 1985, March 31, 1985, April 21, 1985, April 28, 1985, May 5, 1985, May 26, 1985, and June 16, 1985. In addition, the waste storage area was not surveyed during the weeks of January 12, 1985, March 15, 1985, March 22, 1985, March 29, 1985, April 9, 1985, May 17, 1985, May 25, 1985, and June 7, 1985.

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

2. Item 17-6 of an attachment to your letter dated March 29, 1984 requires that all areas will be cleaned where the contamination level exceeds 200 dpm/100 cm².

Contrary to the above, areas where contamination levels exceeded 200 dpm/100 cm² existed on October 19, 1984, October 26, 1984, December 28, 1984, February 8, 1985, and March 9, 1985 and no decontamination of these areas was performed.

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

- D. 10 CFR 19.11(c) requires that a current Form NRC-3, "Notice to Employees", be posted wherever individuals work in or frequent a restricted area.

Contrary to the above, as of June 26, 1984, a current Form NRC-3 was not posted in any locations where individuals work in or frequent restricted areas.

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

Pursuant to the provisions of 10 CFR 2.201, Christ 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.