

Appendix

NOTICE OF VIOLATION

Southeast Missouri Hospital

Licenses No. 24-00128-03; No. 24-00128-05

As a result of the inspection conducted on July 15-16, and 18, 1985, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

License No. 24-00128-03

1. License Condition No. 23 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in certain referenced applications and letters.

The referenced application dated March 5, 1979 states in Item No. 7 that Appendix B of Regulatory Guide 10.8 will be followed. Appendix B of Regulatory Guide 10.8 states that the radiation safety committee will meet as often as necessary to conduct its business, but not less than once in each calendar quarter.

Contrary to this requirement, the radiation safety committee does not meet quarterly. Specifically, the committee did not meet in the third and fourth quarter of 1983 and the second quarter of 1985.

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

2. License Condition No. 23 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in certain referenced applications and letters.

The referenced application dated March 5, 1979 states in Item No. 10 that Appendix C of Regulatory Guide 10.8 will be followed for calibration of survey instruments. Appendix C of Regulatory Guide 10.8 states that survey instruments will be calibrated at least annually and following repair.

Contrary to the above, your Victoreen 7400 survey meter is not calibrated annually. Specifically, your Victoreen 7400 survey meter was calibrated in February of 1982 and September of 1984, a period exceeding the annual requirement.

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

3. License Condition No. 15 states that each sealed source containing licensed material, other than hydrogen-3, with a half-life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed six months.

Contrary to this requirement, a sealed source containing approximately 103 millicuries of strontium-90 was not leak tested every six months. Specifically, leak tests were performed in January 1982, July 1983, July 1984, and February 1985, intervals exceeding six months.

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

License No. 24-00128-05

4. 10 CFR 35.21(e) states that full calibration measurements required by paragraph (a) of this section and physical decay corrections required by paragraph (d) of this section shall be performed by an expert qualified by training and experience in accordance with 10 CFR 35.24.

Contrary to the above, as of the date of this inspection, this requirement has not been met. Specifically, full calibration measurements and physical decay corrections were performed by an individual who is not qualified in accordance with 10 CFR 35.24.

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

5. 10 CFR 35.22(c) states that spot-check measurements required by paragraph (a) of this section shall be performed in accordance with procedures established by an expert qualified by training and experience in accordance with 10 CFR 35.24. If a qualified expert does not perform the spot check measurements, the results of the spot-check measurements shall be reviewed by a qualified expert within fifteen days.


Contrary to the above, spot check measurements performed on you cobalt-60 teletherapy unit have not been reviewed as required. Specifically, results of spot check measurements, performed by an individual who is not a qualified expert, were not reviewed by an expert qualified in accordance with 10 CFR 35.24.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

AUG 2 - 1985

Dated _____


D. G. Wiedeman, Chief
Nuclear Materials Safety Section 1