

APPENDIX A
NOTICE OF VIOLATION

Veterans Administration
Butler, Pa 16001

Docket No. 030-10246
License No. ~~3~~ 7-16034-01

As a result of the inspection conducted on May 30 and 31, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. License Condition No. 17 states licensed material shall be possessed and used in accordance with statements, representations, and procedures contained in application dated January 22, 1979, and letter dated January 17, 1980.

1. Item 3.C. of the letter requires the Medical Isotopes Committee (MIC) to meet once each calendar quarter.

Contrary to this requirement, as of the dates of this inspection, the MIC has not met at the specified frequency. The MIC met during October 1983, August and September 1984, intervals in excess of a calendar quarter.

This is a Severity Level V violation (Supplement VI)

2. Item 10 of the application requires the frequency of calibration for each survey meter to be at least annually.

Contrary to this requirement, as of the dates of this inspection, the survey instruments had not been calibrated since April 1984 a period in excess of one year.

This is a Severity Level IV violation (Supplement VI)

3. Item 17 of the application requires the method for performing wipe tests to be sufficiently sensitive to detect 100 dpm.

Contrary to this requirement, as the dates of this inspection, the instrument used to perform the wipe test measurements had not been calibrated to show that the method is sufficiently sensitive to detect 100 dpm.

This is a Severity Level IV violation (Supplement VI)

- B. 10 CFR 35.14(e)(1)(i) requires any licensee possessing sealed calibration or reference sources pursuant to medical use groups in 10 CFR 35.100, shall cause each sealed source to be tested for leakage and/or contamination at intervals not to exceed six months.

OFFICIAL RECORD COPY

DLVABUTLER85-01 - 0003.0.0
07/16/85

8508150503 850729
REG1 LIC30
37-16034-01 PDR

Contrary to this requirement, as of the dates of this inspection, leak and/or contamination tests on cesiums-137 sealed calibration sources in excess of 100 microcuries had not been performed.

This is a Severity Level IV violation (Supplement VI)

- C. 10 CFR 35.14(f)(2) requires any licensee who possesses and uses calibration and reference sources in amounts not to exceed 3 millicuries each, shall conduct a quarterly physical inventory to account for all sources received and possessed.

Contrary to this requirement, as of the dates of this inspection, quarterly physical inventories had not been performed to account for all calibration and reference sources received and possessed.

This is a Severity Level IV violation (Supplement VI)

Pursuant to the provisions of 10 CFR 2.201, The V.A. Medical Center, Butler, PA 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.