

APPENDIX A
NOTICE OF VIOLATION

Ludlow Hospital
Ludlow, Massachusetts 01056

License No. 20-18133-01
Docket No. 30-14538

As a result of the inspection conducted on April 26, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

A. Condition 16 of License No. 20-18133-01 requires that licensed material be possessed and used in accordance with the statements, representations and procedures contained in an application dated June 20, 1983, and letters dated June 30, 1983 and August 25, 1983.

1. Block 10 of this application requires that dose calibrators be calibrated in accordance with procedures contained in Appendix D, Section 2, of Regulatory Guide 10.8.

Items C.2 and H of Appendix D, Section 2, requires that dose calibrators be checked daily with a long-lived standard radionuclide at all commonly used radionuclide settings and that control charts of instrument constancy be maintained.

Contrary to the above, as of April 26, 1985, the dose calibrator was not checked on all commonly used radionuclide settings with a long-lived standard radionuclide and the required control charts were not maintained.

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

2. Block 15 of this application requires that radioactive material be used in accordance with Appendix G of Regulatory Guide 10.8.

Item 1 of Appendix G requires that lab coats be worn at all times while handling radioactive materials.

Contrary to the above, on April 26, 1985, personnel in the Nuclear Medicine Department failed to wear lab coats while handling radioactive materials.

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

3. 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.

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- a. Item 1 of Appendix I requires that all elution, preparation and injection areas be surveyed daily. Item 4.b of this Appendix requires that weekly surveys include wipe tests. Contrary to the above, as of April 26, 1985, elution, preparation and injection areas were surveyed at weekly intervals, and wipe tests were performed monthly.
- b. Item 4.b of Appendix I requires that, when wipe tests are performed on designated laboratory areas, the results be evaluated for contamination.

Contrary to the above, as of April 26, 1985, wipe tests were not adequately evaluated for contamination in that the counting equipment used for the evaluation did not have the required sensitivity. Specifically, wipes were evaluated in the dose calibrator, which is not sufficiently sensitive to detect contamination.

These are Severity Level IV violations. (Supplement VI)

- B. 10 CFR 20.401(b) requires that each licensee maintain records showing the results of surveys required by 10 CFR 20.201(b).

Contrary to the above, as of April 26, 1985, adequate records were not maintained of the contamination and radiation surveys that were performed within your Nuclear Medicine Department.

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

Pursuant to the provisions of 10 CFR 2.201, Ludlow 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.