APPENDIX A

NOTICE OF VIOLATION

VA Medical Center
Philadelphia, Pennsylvania 19104

Docket No. 030-14526
License No. 37-00062-07

As a result of the inspection conducted on February 20-21, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

A. 10 CFR 20.207(a) requires that licensed materials stored in an unrestricted area be secured against unauthorized removal from the place of storage. 10 CFR 20.207(b) requires that materials not in storage be under constant surveillance and immediate control of the licensee. As defined in 10 CFR 20.3(a)(17), an unrestricted area is any area access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

Contrary to the above, as of February 21, 1985, the Waste Storage Room (Rm. A-123) which contained millicurie quantities of licensed material, was unlocked and was not under constant surveillance and immediate control. The laboratory, during these periods, was accessible to visitors and employees.

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

B. Condition 18 of License No. 37-00062-07 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in application dated December 8, 1978: telegrams received July 8, 1981 and September 24, 1981; letters dated November 10, 1980, March 25, 1981, October 15, 1981, October 30, 1981, November 3, 1981, June 30, 1983, October 27, 1983, October 4, 1984 and Model ALARA Program contained in Appendix O of Regulatory Guide 10.8 (Rev. 1), "Guide for the Preparations of Applications for Medical Programs, "October 1980.

1. Item 13.B. of application dated December 8, 1978 requires that byproduct material shipments be monitored immediately upon receipt as a check for damage, leakage, or contamination.

Contrary to the above, as of February 21, 1985, research byproduct material shipments were not being monitored upon receipt.

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

2. Item 5 of "Personnel Precautions and Regulations" of the Radiation Safety Guide submitted with the application dated December 8, 1978 requires that during administration of radioisotope doses to

patients, rubber gloves will be worn. Item 5 of "General Instructions for Physicians and Technicians Utilizing Radioactive Material" of the Radiation Safety Manual requires that personnel monitor (survey) their hands for contamination after handling isotopes.

Contrary to the above, on February 21, 1985, a nuclear medicine technician did not wear gloves when preparing doses or administering doses to patients. In addition, this technician failed to adequately monitor her hands after handling isotopes. Measurements by the inspector indicated that this technician had contamination on her hands of which she was unaware.

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

3. Item 5(d) of letter dated October 27, 1983 requires that survey instruments be calibrated according to the method stated in Appendix D of Regulatory Guide 10.8.

   Item A.3 of Appendix D, Section 1 requires that survey meters be calibrated at least annually and after servicing.

   Contrary to the above, survey meters were not calibrated from July, 1983 until December 1984.

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

4. Item 14 of application dated December 8, 1978 requires that once a month the Radiation Safety Officer with the assistance of one member of the Radioisotope Subcommittee inspect all radioisotope laboratories.

   Contrary to the above, no inspections were performed from May, 1983 to January, 1985.

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

5. Item F, "Methods of Xenon-133 Disposal", of the application dated December 8, 1978 requires that the canisters be removed every month and imaged to determine when the trapping device should be replaced.

   Contrary to the above, as of February 21, 1985, the canisters were not monitored monthly. Monitoring of the canisters was last conducted in November, 1984.

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

6. Item 11(c) of application dated December 8, 1978 requires that daily or before each use the activity of at least one reference source be measured and recorded and also the apparent activity of a long-lived standard radionuclide be measured and recorded at all of the commonly used radionuclide settings.

   Contrary to the above, on February 21, 1985 the results of these tests were not recorded on numerous occasions in 1984 and 1985.

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

C. 10 CFR 35.14(e)(1) requires that sealed calibration or reference sources possessed pursuant to 10 CFR 35.14(d) be tested for leakage and/or contamination at intervals not to exceed six months. 10 CFR 35.14 (f)(2) requires that a quarterly physical inventory by conducted to account for all calibration and reference sources possessed pursuant to 10 CFR 35.14(d)(4).

   Contrary to the above, as of February 21, 1985, sealed sources used in Nuclear Medicine for dose calibrator calibrations had not been tested for contamination or leakage and physical inventories had not been performed since 1981.

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

D. Condition 13.E. of License No. 37-00062-07 requires that records of leak tests be maintained in units of microcuries.

   Contrary to the above, as of February 21, 1985, records of leak tests of foils containing nickel-63 were not maintained in units of microcuries because the counter used to evaluate these leak tests was not calibrated.

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

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