

APPENDIX A
NOTICE OF VIOLATION

Washington Hospital Center
110 Irving Street, N.W.
Washington, D.C. 20010

Docket Nos. 030-01325
030-09588
License Nos. 08-03604-03
08-03604-04

As a result of the inspection conducted on June 20, 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 June 20, 1985, the key to the cobalt-60 teletherapy machine was left in the console, which is in an unrestricted area, during periods when the console was not under constant surveillance and immediate control of the licensee. (License No. 08-03604-04)

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

- B. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, as of June 20, 1985, no surveys were made to determine that individuals who handled significant quantities of iodine-131 were not exposed to airborne concentrations exceeding the limits specified in 10 CFR 20.103. Specifically, no surveys (evaluations, including air monitoring and thyroid monitoring where applicable) were made during numerous preparations and administrations of up to 28 millicuries of iodine-131. (License No. 08-03604-03)

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

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- C. 10 CFR 19.12 requires that all individuals working in or frequenting any portion of a restricted area be instructed in the precautions and procedures to minimize exposure to radiation and radioactive materials, and in the applicable provisions of the Commission's regulations and licenses.

Contrary to the above, as of June 20, 1985, the security staff, who frequent restricted areas, had not been instructed in the required subjects.

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

Pursuant to the provisions of 10 CFR 2.201, Washington Hospital 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.