

APPENDIX
NOTICE OF VIOLATION

St. Patrick Hospital
Missoula, Montana

Docket: 30-14734/85-01
License: 25-16773-02

During an NRC inspection conducted on July 24 and 25, 1985 violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

- A. License Condition 18 requires, in part, that licensed activities be conducted in accordance with statements, representations, and procedures contained in the application dated April 12, 1984, and a letter dated July 10, 1984.

1. Item 17 of the application, "Area Survey Procedures," incorporates Appendix I of Regulatory Guide 10.8, Revision 1, October 1980 which requires, in part, that surveys of the elution, preparation, and injection areas be performed daily and that a series of wipe tests to measure contamination levels in laboratory areas be performed weekly.

Contrary to this requirement, daily surveys of the elution, preparation, and injection areas had not been performed during the period July 9, 1984, to May 15, 1985, and weekly wipe tests to measure contamination levels had not been performed during the period April 1979 to July 1985.

2. Item 10 of the application, "Procedures Followed for Dose Calibrator," incorporates Appendix D, Section 2 of Regulatory Guide 10.8, Revision 1, October 1980 which requires, in part, that when in use the constancy tests be performed daily on the dose calibrator and that linearity tests be performed quarterly.

Contrary to this requirement, daily constancy tests were not performed during the period June 3, 1983, to June 13, 1983, when the dose calibrator was used to assay patient doses and quarterly linearity tests were not performed during the third and fourth quarters of 1984.

This is a Severity Level IV Violation (Supplement VI.D.2).

- B. 10 CFR 20.207(a) requires that licensed materials stored in an unrestricted area be secured from unauthorized removal from the place of storage.

Contrary to this requirement, the storage room where spent generators are held for decay is located within the Radiology Department, which is accessible to other than Radiology Department personnel during non-regular working hours. This storage room could not be secured to prevent unauthorized removal of radioactive material.

This is a Severity Level IV Violation (Supplement VI.D.2).

- C. 10 CFR 20.203(e)(1) requires that each area or room in which licensed material is used or stored and which contains any material in an amount exceeding 10 times the quantity of such material specified in Appendix C of Part 20 shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words:

CAUTION
RADIOACTIVE MATERIAL

Contrary to this requirement, the storage room in which such quantities of licensed materials were stored was not posted with such signs on July 24, 1985.

This is a Severity Level V Violation (Supplement VI.E).

Pursuant to the provisions of 10 CFR 2.201, St. Patrick Hospital is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas
this 9th day of August 1985.