

## NOTICE OF VIOLATION

St. Elizabeth Hospital  
Appleton, Wisconsin

License No. 48-10219-01  
Docket No. 030-03466

During an NRC inspection conducted on June 25, 1996 with continuing NRC review through March 19, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381, dated June 30, 1995), the violation is listed below:

Condition 18 of License No. 48-10219-01 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated December 27, 1988.

Item 10.14 of the application dated December 27, 1988 states that the licensee will establish and implement the model procedure for radiation safety during radiopharmaceutical therapy that was published in Appendix P to Regulatory Guide 10.8, Revision 2.

Item 10 of Appendix P to Regulatory Guide 10.8, Revision 2 titled "Model Procedure for Radiation Safety During Iodine Therapy Over 30 Millicuries" states, in part, that 1 day after the dosage administration of liquid or gelatin-capsuled I-131, the licensee shall measure the thyroid burden of all personnel who were present for the administration.

Contrary to the above, on June 5 and September 20, 1995, patients were treated with a liquid or gelatin-capsuled iodine-131 therapy dose in excess of 30 millicuries and the licensee failed to measure the thyroid burden, 1 day after the dosage administration, of the technicians whom administered the dose. Specifically, the licensee measured the thyroid burden of the above technicians on the same day the iodine-131 therapy doses were administered.

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

Pursuant to the provisions of 10 CFR 2.201, St. Elizabeth Hospital is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region III, 801 Warrenton Road, Lisle, Illinois 60532-4351 within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois  
this 3rd day of April 1997