

## APPENDIX A

Lahey Clinic Foundation  
Burlington, MA 01805

Docket No. 030-01879  
License No. 20-05766-02

As a result of the inspection conducted on October 29, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 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.
- (1) Contrary to the above, 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 the preparation and administration of 98 millicuries of iodine-131 on July 13, 1985.
  - (2) Contrary to the above, on October 29, 1985, no surveys were made to assure compliance with 10 CFR 20.301, which describes authorized means of disposing of licensed material contained in waste. Specifically, on October 29, 1985, an inadequate survey was made for licensed material in trash cans prior to disposing of the material to the normal trash.

These are Severity Level IV violations. (Supplement IV)

- B. 10 CFR 35.14(b)(5)(vii) requires that patients treated with cesium-137 or iridium-192 implants remain hospitalized until a source count and a radiation survey of the patient confirm that all implants have been removed.

Contrary to the above, since May 1982, patients treated with brachytherapy implants have been released from the hospital without the required radiation survey having been performed.

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

Pursuant to the provisions of 10 CFR 2.201, Lahey Clinic Foundation 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.

OFFICIAL RECORD COPY