APPENDIX A

NOTICE OF VIOLATION

Damon Clinical Laboratory, Inc.
Westwood, Massachusetts

Docket No. 030-07625
License No. 20-14076-01

As a result of the inspection conducted on February 25, 1986, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

A. 10 CFR 19.12 requires that all individuals working in or frequenting any portion of a restricted area be kept informed of the storage, transfer, or use of radioactive materials or of radiation in such portions of the restricted area; be instructed in the health protection problems associated with exposure to such radioactive materials or radiation, in precautions or procedures to minimize exposure, and in the purposes and functions of protective devices employed; and be instructed in, and instructed to observe, to the extent within the worker's control, the applicable provisions of Commission regulations and licenses for the protection of personnel from exposure to radiation or radioactive materials occurring in such area.

Contrary to the above, as of February 25, 1986, individuals from various divisions of Damon Clinical Laboratory, Inc. that had access to an area where licensed material is stored had not been instructed in any of the above.

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 February 25, 1986, 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, surveys are not made of trash in the radioisotope laboratory containing biohazard material in which the inspector measured approximately 15 thousand counts per minute of iodine-125.

C. 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 February 25, 1986, no evaluations were made to assure compliance with 10 CFR 20.303, which limits the disposal of licensed material by release to the sanitary sewerage system. Specifically, no evaluation was made of the releases to the sewerage system in the radioisotope laboratory where the inspector measured 4000 counts per minute of iodine-125 at the drain of a sink.

D. Conditions 6.A and 8.A of License No. 20-14076-01 limits the amount of iodine-125 that you may possess at any one time to a total of 5.5 millicuries.

Contrary to the above, on December 18, 1985, according to the licensee's inventory record and accounting for radioactive decay, the licensee possessed at least 6.5 millicuries of iodine-125 which is in excess of the amount the licensee may possess at any one time.

These are Severity Level IV violations. (Supplement VI)

Pursuant to the provisions of 10 CFR 2.201, Damon Clinical Laboratory, Inc. 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.