

NOTICE OF VIOLATION

Holzer Medical Center

License No. 34-06002-01

As a result of the inspection conducted on December 4, 1985, and in accordance with the "General Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the following violations were identified:

1. License Condition No. 19 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in certain referenced documents.

The referenced November 28, 1984 application states that security personnel will receive radiation safety training at annual intervals.

Contrary to the above, security personnel, responsible for off-hours receipt of packages containing licensed material, have not been trained since February 1984.

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

This is a repeat violation.

2. 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(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, molybdenum-99/technetium-99m generators are stored in an unlocked, unrestricted storage room and not under the licensee's constant surveillance nor immediate control.

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

3. License Condition No. 19 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in certain referenced documents.

The referenced November 28, 1984 application states that area survey procedures detailed in Regulatory Guide 10.8, Appendix I will be followed. Appendix I requires weekly GM surveys and wipe tests in waste storage areas.

Contrary to the above, the long lived waste storage area is not included in the weekly area survey program.

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

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4. License Condition No. 19 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in certain referenced documents.

The referenced November 28, 1984 application states that Regulatory Guide 10.8, Appendix D procedures will be followed for calibration of the dose calibrator. Appendix D requires the performance of a geometry test at installation, quarterly linearity tests and annual accuracy tests. The maintenance of test records is also required.

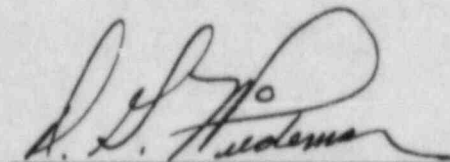
Contrary to the above, a geometry test was not performed at the time of installation of the dose calibration, a linearity test has not been done since July 1985 and records of the April 1985 accuracy test were not maintained for inspection.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

DEC 19 1985

Dated _____



D. G. Wiedeman, Chief
Nuclear Materials Safety
Section 1