

APPENDIX A

NOTICE OF VIOLATION

Veterans Administration Medical Center
4051 Arroyo Road
Livermore, California 94550

License No. 04-09450-02

As a result of the inspection conducted October 21-22, 1985, and in accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, the following violations were identified:

- A. 10 CFR 20.207(a) states that licensed material stored in an unrestricted area shall be secured from unauthorized removal from the place of storage.

Contrary to the above requirement, at the time of the inspection, the files storage room (Room 212B) which also serves as a storage area for licensed radioactive material being held for decay, was observed to be unsecured.

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

- B. 10 CFR 35.14(f)(2) requires, in part, that any licensee who possesses and uses calibration and reference sources (not to exceed 3 millicuries per source) shall conduct a quarterly physical inventory to account for all sources received and possessed.

Contrary to the above requirement, a quarterly inventory had not been conducted during the last quarter of 1984. This is a repetitive violation.

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

- C. License Condition 17 states, in part, that except as specifically provided otherwise by this license, the licensee shall possess and use licensed material in accordance with statements, representations, and procedures contained in application dated May 13, 1985.

1. Item 10, of the above application states, in part, that daily consistency tests will be conducted on the dose calibrator and that variations of greater than 5% indicates instrument repair, adjustment or recalibration is required.

Contrary to the above requirement, the dose calibrator was used during the period from October 15, 1984 to January 23, 1985, when the daily consistency checks indicated variations of greater than 5%. This is a repetitive violation.

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

2. Item 10, of the above application states, in part, that linearity tests of the dose calibrator will be conducted on a quarterly basis.

Contrary to the above requirement, only two linearity tests had been conducted during 1983 on February 14, 1983 and on November 1, 1983.

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

3. Item 15.P, of the above application states, that radioactive waste should be disposed of only in designated areas.

Contrary to the above requirement, at the time of the inspection, two pieces of gauze and one piece of paper contaminated with licensed material were found in the non-radioactive waste trash can located in the nuclear medicine hot laboratory. The pieces of gauze measured approximately 120,000 dpm each and the piece of paper measured approximately 20,000 dpm using a Eberline Model E-520 survey meter with a HP-260 probe.

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

4. Item 17, of the above application states, that Appendix I of Regulatory Guide 10.8 will be followed. Appendix I states in part, that all elution, preparation and injection areas will be surveyed daily and that all laboratory areas using more than 100 uCi of radioactive material will be surveyed weekly. Weekly surveys will consist of both radiation and wipe surveys.

Contrary to the above requirement:

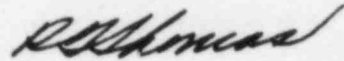
- a. Daily surveys had not been conducted on the following representative dates of July 23, 30; September 3, 6, 16, 30; and October 15 of 1985.
- b. Weekly wipe surveys had not been conducted on occasions, e.g. only three weekly wipe surveys had been conducted monthly during January, February, March, September and October of 1985.
- c. Weekly radiation surveys had not been conducted on occasions, e.g. only two weekly surveys had been conducted during January and three weekly surveys per month had been conducted during May, September, October and November of 1985.

The above items constitute a Severity Level IV Violation (Supplement VI).

Pursuant to the provisions of 10 CFR 2.201, Veterans Administration Medical Center, Livermore, California is hereby required to submit to this office within thirty days of the date of 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 items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

NOV 12 1985

Dated



R. D. Thomas, Chief
Nuclear Materials Safety Section