

APPENDIX A

NOTICE OF VIOLATION

Union Carbide Corporation

Docket No. 70-687
License No. SNM-639

As a result of the inspection conducted on November 3-6, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. License Condition 14 states, in part, "... the licensee shall post all storage and use locations with criticality safety signs which indicate the maximum quantity of special nuclear material that is authorized at each location and the actual amount that is present at each location." License Condition 15 states that where U-235 mass limits are imposed as criticality control criteria, the licensee shall maintain running U-235 inventory records to assure that these masses are not exceeded.

Contrary to the above, on November 4, 1981, you failed to post a use location where targets are counted in the Quality Control Laboratory area and the running inventory record for the area did not include the contents of 14 target tubes (approximately 220 grams U-235) which were located in the area.

This is a Severity Level IV violation (Supplement VI.D.3)

- B. Condition 9 of your facility license as amended by Amendment No. 1 dated November 8, 1976, incorporates your approved license application dated August 12, 1976, which requires (on page 3) the Nuclear Safeguards Committee to appoint an individual who is not in the Nuclear Operations direct line organization to perform an audit of operations which are conducted under the SNM-639 License at least once every 12 months.

Contrary to the above, between August 31, 1979 and November 3, 1981 (a period of 26 months), no audit of operations conducted under the SNM-639 license was performed.

This is a Severity Level IV Violation (Supplement VI.D.1)

Pursuant to the provisions of 10 CFR 2.201, Union Carbide Corporation, 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

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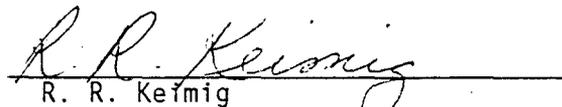
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will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Where good cause is shown, consideration will be given to extending your response time.

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Original Signed By:

Dated NOV 24 1981


R. R. Keimig
Projects Branch No. 2
Division of Resident and
Projects Inspection

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