

NOTICE OF VIOLATION

RSA Laboratories
Hebron, CT

Docket No. 03033025
License No. 06-30007-01

During an NRC inspection conducted on December 15, 2011, for which a telephonic exit meeting was conducted on January 25, 2012, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A: License Condition No. 23 of NRC License No. 06-30007-01 requires, in part, that the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the licensee's application dated February 3, 2003 (ML030420180). Item 10.1 of RSA's renewal application dated February 3, 2003, states that all RSA personnel, while engaged in licensed activities at either permanent facility or customers' sites, will wear personal radiation-monitoring devices while performing such work.

Contrary to the above, on December 15, 2011, an RSA technician did not wear personal dosimetry while engaged in licensed activity, per License Condition No. 23 of their NRC License (06-30007-01). Specifically, an RSA technician was not wearing personal dosimetry while removing fixed gauges at the AES Thames, LLC facility in Uncasville, Connecticut.

This is a Severity Level IV violation. (Supplement 6.3)

- B: 10 CFR 20.1501(a) requires, in part, that each licensee shall make surveys that evaluate the magnitude and extent of radiation levels and any potential radiation hazards that may be present.

Contrary to the above, on December 15, 2011, the RSA technician did not make surveys that evaluate the magnitude and extent of radiation levels and any potential radiation hazards that might be present. Specifically, the RSA technician didn't use a survey meter while performing fixed gauge decommissioning activities, and as a result, could not evaluate the magnitude and extent of radiation levels and any potential radiation hazards that might be present during these activities.

This is a Severity Level IV violation. (Supplement 6.7)

Pursuant to the provisions of 10 CFR 2.201, RSA Laboratories is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response which contests an enforcement action shall be submitted under oath or affirmation.

Your response will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 6 day of February 2012