

## APPENDIX B

### NOTICE OF VIOLATION

Public Service Electric and Gas  
Company  
License No. DPR-70

Docket No. 50-272

Based on the results of the NRC inspection conducted January 28 - February 8, 1980, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your license as indicated below. Item 1 and 2 are Infractions, Item 3 is a Deficiency.

1. Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 8.B(1)(aa) states that, specific procedures for surveillance, test, inspections and calibrations should be written for area, portable, and airborne radiation monitoring instruments.

The following procedures were written in accordance with this Technical Specification:

- a. Station Procedure PD-15.9.004, "Calibration of the Radiation Monitor, Model RM-14", Rev. 0, Paragraph A.I.7 states, "place a beta-gamma standardization source against or directly under the probe, the indicated count rate should be 10-20% of the indicated standard DPM for the pancake detectors."
- b. Station Procedure PD-15.9.009, "Calibration of Eberline Portable Neutron Rem Counter", PNR-4, Rev. 0, Paragraph A.I.2-5 states, "place instrument in a 4 millirem per hour, 40 millirem per hour, 400 millirem per hour and 4 rem per hour neutron field and check reading. If correct readings within 10% are not obtained in all fields, proceed to Section II."

Contrary to Technical Specification 6.8.1, the following observations were made on February 5, 1980:

- a. Station Procedure PD-15.9.004 was not adhered to in that a beta-gamma standardization source was not being used to calibrate the RM-14 instrument. Observations and interviews with Instrument Repair Technicians indicates that only an electronic calibration using a pulse generator is used in the calibration of the RM-14.
- b. Station Procedure PD-15.9.009 is not being adhered to in that the PNR-4 instrument is not placed in a 4 millirem per hour, 40 millirem per hour, 400 millirem per hour or 4 rem per hour neutron field and checked. Observations and interviews indicated that this part of the procedure is not being adhered to because the output from the neutron source is not known.

- c. On February 6, 1980 it was determined that there are no procedures established, implemented or maintained detailing calibration of the air flow on air sampler equipment used within the station, specifically the Staplex air samplers.
2. Technical Specification 6.8.2 states in part that, each procedure and administrative policy of Technical Specification 6.8.1 and changes thereto shall be reviewed by the SORC and approved by the Station Manager prior to implementation.

Contrary to this specification, on February 6, 1980 it was observed that Station Procedure PD-15.9.011, "Calibration of Teletector 6112" and Station Procedure PD-15.9.002, "Background and Efficiency Determination on BC-4 and SCA-4 Counting Instruments" had been changed and implemented in the field without being subjected to review by the SORC and approved by the Station Manager prior to implementation of those changes.

3. 10 CFR 20.203(f) requires that each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents. The label shall bear the radiation caution symbol and the words:

"Caution Radioactive Material"

or

"Danger Radioactive Material"

The label shall also provide sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof to take precautions to avoid or minimize exposures.

Contrary to the above, several tours in the controlled areas, conducted during the period January 28 thru February 8, 1980, identified bags of radioactive trash reading up to 4 mR/hr on contact that were not labelled and no exemption applied.