

APPENDIX A

NOTICE OF VIOLATION

UNC Naval Products  
Uncasville, Connecticut

Docket No. 70-371  
License No. SNM-368

As a result of the inspection conducted on UNC Naval Products facility on August 21-25, 1989, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. Condition No. 10 of License No. SNM-368 requires that the licensee operate in accordance with the statements, representations and conditions in Part I of the application. Section 2.5.1 of Chapter 2, "Organization, Personnel and Administration", of Part I requires that licensee management assure suitable control measures are prescribed for nuclear criticality safety. Section 3.2.1 of Chapter 3, "Nuclear Criticality Safety Standards", of Part I requires that nuclear criticality safety (NCS) evaluations consider all factors which may affect the criticality of a system, including the interaction parameter. Section 3.6 of Chapter 3 of Part I requires that the application and use of markings for the overall NCS program be established by the licensee on the basis of a documented NCS evaluation.

Contrary to the above, the licensee failed to perform a complete nuclear criticality safety evaluation of a raw fuel container storage box in the Unit 1 Quality Control area which resulted in the failure to properly apply and use floor markings around the storage box for nuclear criticality safety control.

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

- B. 10 CFR 70.41(b) states that the licensee shall be subject to the provisions of the license. Condition No. 10 of License No. SNM-368 requires that the licensee operate in accordance with the statements, representations and conditions in Part I of the application. Section 2.2.2.3 of Chapter 2, "Organization, Personnel, and Administration", of Part I states that the Health Physics Specialist is responsible for the administration of the licensee's radiation protection program.

Contrary to the above, the licensee implemented a change to the safety organization described in Part I of the license without NRC approval, which reassigned the administration of the daily health physics surveillance program to a newly-developed position of Health Physics Supervisor.

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

Pursuant to the provisions of 10 CFR 2.201, UNC Naval Products is hereby required to submit to this office within thirty days of the date of the letter

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which transmitted 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 violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.