

APPENDIX A

NOTICE OF VIOLATION

American Cyanamid Company
Princeton, New Jersey 08540

Docket No. 030-05337
License No. 29-07694-01

As a result of the inspection conducted on August 22, 1989, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1988), the following violations were identified:

- A. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, as of August 22, 1989, an evaluation was not made to assure compliance with 10 CFR 20.106, which limits the yearly average concentration of radioactive material in air discharged to unrestricted areas. Specifically, an evaluation was not made of the concentration of iodine-125 in the air discharged from a chemical fume hood in which two millicuries of iodine-125 were used for radioiodinations each month.

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

- B. 10 CFR 20.401(b) requires that each licensee maintain records of disposal made under 10 CFR 20.303.

Contrary to the above, as of August 22, 1989, records were not maintained of the disposals of licensed materials made to the sanitary sewerage system. Specifically, laboratories where microcurie quantities of radioactive materials were used did not maintain records of sewer disposals.

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

- C. Condition 23 of License No. 29-07694-01 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in a letter dated May 10, 1983.

This letter requires that the Radiation Safety Officer perform monthly surveys for radioactive contamination in laboratories where radioactive materials are used.

Contrary to the above, as of August 22, 1989, the Radiation Safety Officer performed surveys for removable radioactive contamination at three month intervals in Room C-118, where up to 600 millicuries of carbon-14 were used per month.

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

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Pursuant to the provisions of 10 CFR 2.201, American Cyanamid Company is hereby required to submit to this office within thirty days of the date of the letter 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.