

APPENDIX A  
NOTICE OF VIOLATION

Associated Wireline Service, Inc.  
Wichita Falls, Texas

Docket: 030-06432/89-01  
License: 42-11649-01

During the NRC inspection conducted on August 21 and September 11, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the violations are listed below:

10 CFR 71.5 states, in part, that each licensee who transports licensed material outside the confines of its plant shall comply with the applicable requirements of 49 CFR Parts 170 through 189.

- a. 49 CFR 172.200(a) requires each person who offers a hazardous material for transportation to describe the material on a shipping paper in the manner required by Subpart C of 49 CFR Part 172.

Contrary to the above, the licensee had not prepared shipping papers for shipments of I-131 tracer materials to licensee work sites from July 1, 1986, through September 1, 1989.

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

- b. 49 CFR 173.461 requires the licensee to demonstrate compliance with Type A package tests by prescribed methods.

Contrary to the above, the licensee used a sturdy homemade package that appeared to meet the Type A package tests; however, the licensee had not demonstrated compliance with the test requirements using a prescribed method.

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

- c. 49 CFR 172.300(a) requires each person who offers a hazardous material for transportation to mark each package in the manner prescribed by Subpart D of 49 CFR Part 172.

Contrary to the above, the licensee had no markings on packages containing I-131 tracers that were shipped to temporary job sites between July 1, 1986, and September 1, 1989.

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

- d. 49 CFR 172.400(a) requires each person who offers a hazardous material for transportation to label each package in the manner prescribed in Subpart E of 49 CFR Part 172.

Contrary to the above, the licensee had no labelings on packages containing I-131 tracers that were shipped to temporary job sites between July 1, 1986, and September 1, 1989.

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

Pursuant to the provisions of 10 CFR 2.201, Associated Wireline Service, Inc., is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this 27th day of November 1989