

APPENDIX A

NOTICE OF VIOLATION

Merrimack College
North Andover, Massachusetts 01845
License Nos. SNM-648
20-8852-02

Docket Nos. 70-710
30-8305

Based on the results of an NRC inspection conducted on November 5 and 6, 1979, 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:

- A. Condition 13A(1) of License No. SNM-648 requires that you test your sealed sources containing byproduct material for leakage and/or contamination at intervals not to exceed six months.

Contrary to this requirement, as of the date of the inspection, November 5, 1979, you had not tested your Plutonium-Beryllium source for contamination during 1979, an interval of more than six months.

This is an infraction.

- B. Condition 13B of license No. SNM-648 requires that your method of testing sealed sources for leakage and/or contamination be capable of detecting the presence of 0.005 microcuries of radioactive material on the test sample.

Contrary to this requirement, your method of testing your sealed sources was not capable of detecting this level of activity for your Pu-Be source.

This is an infraction.

- C. Condition 15 of your license No. 20-8852-02 requires that you open all packages containing byproduct material in accordance with the procedures described in Appendix F.a, "Guide for Preparation of Applications for Medical Programs."

Contrary to this requirement, as of the day of the inspection, November 6, 1979, you failed to open packages in accordance with the required procedures. Specifically, you failed to make the required surveys with a GM survey meter, failed to take wipe tests of external surfaces, and failed to record the surveys that you did make.

This is an infraction.

- D. Condition 8A of your license limits the amount of Co-60 that you may possess at any one time to the amount specified in Column II, Schedule A, Section 33.100, 10 CFR 33.

Contrary to this requirement, on November 6, 1979, you possessed 1.7 mCi of Co-60 which is in excess of these specified limits.

This is an infraction.

- E. 10 CFR 20.401(b) requires that you maintain records of disposals made under the provisions of 10 CFR 20.303.

Contrary to this requirement, as of the date of the inspection, November 6, 1979, you failed to maintain records of the disposals of licensed materials that you have made into the sanitary sewerage system.

This is a deficiency.

- F. Condition 16 of your license requires that licensed material be possessed and used in accordance with the statement, representations and procedures contained in your application dated June 9, 1977.

Appendix 4, Part II, Item 5 of your application requires that working areas should be monitored for contamination after experimental operations have been carried out and records of survey results are to be kept, even if negative.

Contrary to this requirement, as of November 6, 1979, you failed to keep records of surveys at the end of each lab procedure using radioactive materials.

This is a deficiency.