

APPENDIX A

Smith-Emery Company  
781 East Washington Boulevard  
Los Angeles, California 90021

10 CFR 150.20 general license  
State of California License 2878-70

NOTICE OF VIOLATION

Based upon the results of the NRC inspection conducted on July 30, 1980, activities carried out under a general license granted by 10 CFR 150.20 appear to be in noncompliance with NRC requirements as identified below:

- A. 10 CFR 150.20(b)(4) requires that any person who engages in activities in non-agreement states or areas under exclusive federal jurisdiction under a general license provided by 10 CFR 150.20 shall comply with all terms and conditions of the specific license issued by an agreement state.

License condition 12. of the State of California license 2878-70 (amendment 5, dated April 17, 1980) stated that the only persons authorized to act as radiographers were: Edwin Ekberg, Raymond Greene, Donna Provost, and Michael Martin.

Contrary to State of California License 2878-70, condition 12, an unauthorized user T.E. Dickson performed industrial radiography with Iridium-192 on July 1, 1980 at Building 114 at Hunters Point Shipyard.

This is a deficiency.

This item was corrected on July 7, 1980 by Amendment 6 to the State of California License 2878-70, which named T. Dickson and H. Miller as authorized radiographers.

- B. 10 CFR 150.20(b)(1) requires that any person who engages in activities in non-agreement states or areas under exclusive federal jurisdiction under a general license provided by 10 CFR 150.20 shall at least 3 days prior to engaging in each such activity, file four copies of Form NRC-241 and four copies of his agreement state specific license.

No Forms NRC-241 were filed prior to July 15, 1980 when T.E. Dickson performed industrial radiography using an Iridium-192 source aboard the U.S.S. MT. HOOD.

This is a deficiency.

- C. 10 CFR 150.20(b) states that any person who engages in activities in areas under exclusive federal jurisdiction under a general license provided by 10 CFR 150.20 is subject to the provisions of 10 CFR Part 19 and Subpart B of Part 34.

- 1) 10 CFR 19.11(c) states that Form NRC-3, "Notice to Employees," shall be posted by each licensee wherever individuals work in or frequent any portion of a restricted area.

Contrary to 10 CFR 19.11(c), at the time of the inspection, no Form NRC-3 was posted in Building 114 of Hunters Point Shipyard, where industrial radiography has been conducted.

This item was corrected in the presence of the NRC inspector on July 30, 1980, when Form NRC-3 was posted in Building 114.

- 2) 10 CFR 34.43(b) requires that the entire circumference of the radiographic exposure device be surveyed after each radiographic exposure to determine that the sealed source has been returned to its shielded position.

Contrary to 10 CFR 34.43(b), licensee representatives stated that linear rather than circumferential surveys were conducted after each radiographic exposure.

This is a deficiency.