

APPENDIX A

NOTICE OF VIOLATION

United Nuclear Corporation

Docket No. 70-820

Based on the results of an NRC inspection conducted May 14-16, 1980, 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.

Item A is an infraction. Items B and C are deficiencies.

- A. Condition No. 9 of Special Nuclear Material License No. SNM-777 incorporates Section 200 of the licensee's application. Subsection 207.1 of Section 200 states, "An annual audit shall be conducted by a technically competent person(s) not directly a part of the plant organization and the Manager, Operations. The results of this audit shall be reported to the General Manager and the Manager NIS, and shall include reviews of both the radiological and criticality safety programs.

The audit shall include an analysis of the radiation exposure for each work station and recommendations for action necessary to maintain personnel exposure at levels as low as reasonably achievable."

Contrary to the above, the audit of the radiological safety program conducted in December 1979 did not include an analysis of the radiation exposure for each work-station.

- B. Condition No. 22 of Special Nuclear Material License No. SNM-777 states, "The licensee shall collect water samples on a monthly basis at locations and monitoring wells as identified in Figure 407.2-III and Table 407.2-II (except for well No. W-8 which is dry) of the submittal dated May 10, 1978. The collected water samples shall be analyzed for:

- (a) Gross-alpha and beta radioactivity. If the gross-alpha and beta concentrations exceed 16 pC/l and 50 pC/l respectively, identification of major nuclides and determination of their concentrations shall be conducted by the licensee.
- (b) pH, nitrate, and fluoride. If the concentration of nitrate (measured as N) exceeds 10 ppm, analysis of trace element concentrations, i.e., Cd, Hg, Pb, Mo, Zn, and Ni in the water sample shall be performed."

Contrary to the above, at least 50 well water samples for the period from August-November 1979, have exceeded the gross-alpha and beta concentrations and/or the nitrate concentration and the samples have not been analyzed for the major nuclides or the specific chemical elements as required.

- C. Condition No. 9 of Special Nuclear Material License No. SNM-777 incorporates Section 400 of the licensee's application. Subsection 4.4.1 states "Contamination surveys shall be performed and documented on incoming and outgoing shipments of radioactive material and material leaving the contamination areas to unrestricted areas to assure compliance with applicable regulations."

Contrary to the above, on May 14, 1980, a riding lawn mower was moved from a contaminated area to an unrestricted area and it was not surveyed.