

NOTICE OF VIOLATION

TEI Analytical Services, Inc.
Washington, Pennsylvania 15301

Docket No. 030-29882
License No. 37-28004-01
EA 90-12

During an NRC inspection conducted on January 4, 17 and 18, 1990, 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, (Enforcement Policy) (1989), the violations are set forth below:

I. VIOLATIONS INVOLVING, OR ASSOCIATED WITH, THE OVEREXPOSURE

- A. 10 CFR 20.101(a) requires, in part, that no licensee use licensed material in such a manner as to cause any individual in a restricted area to receive in any period of one calendar quarter a total occupational dose to the hands in excess of 18.75 rems.

Contrary to the above, during the fourth calendar quarter of 1989, specifically, on December 14, 1989, a radiographer's assistant, while performing radiography (with a 68.7 curie iridium 192 source) on a natural gas pipeline in a 14 foot deep trench (restricted area) in Gould City, Michigan, received a radiation exposure of 36.27 rems to the palm of the right hand.

- B. 10 CFR 34.43(b) requires, in part, that a physical radiation survey be made with a calibrated and operable radiation survey instrument after each radiographic exposure (including a survey of the entire circumference of the device, as well as the source guide tube) to determine that the sealed source has been returned to its shielded position.

Contrary to the above, on December 14, 1989, after a radiographic exposure was completed at a field site in Gould City, Michigan, the radiographer's assistant's survey did not include the entire circumference of the device nor the guide tube to determine that the sealed source had returned to its shielded position.

These violations have been categorized in the aggregate as a Severity Level III problem. (Supplements IV and VI)

II. VIOLATION OF OTHER REGULATORY REQUIREMENTS

10 CFR 71.12 requires that, prior to first transporting or offering to a carrier for transport, packages which have NRC approved Certificates of Compliance, a shipper shall register with the Commission as a secondary user of the packages, and obtain NRC approval of a Quality Assurance Plan which delineates the program for the management of the shipment and the maintenance activities for the packages.

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Contrary to the above, from January 28, 1987 through January 4, 1989, the licensee had transported licensed materials (namely, Automation Industries Model 520 radiographic exposure devices approved by NRC Certificate of Compliance Number 9033) in its own vehicles; and offered to carriers to transport Source Production and Equipment Company sealed source changeouts Model C-1 authorized by NRC Certificate of Compliance 9007; however, the licensee had not registered with the NRC as a user of the packages nor obtained NRC approval of a Quality Assurance Plan.

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

Pursuant to the provisions of 10 CFR 2.201, TEI Analytical Services, Incorporated (Licensee) is hereby required to submit a written statement or explanation to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, with a copy to this office, within 30 days of the date of this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each alleged violation: (1) admission or denial of the alleged violation, (2) the reasons for the violation if admitted, (3) corrective steps that have been taken and the results achieved, (4) the corrective steps that will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By
WILLIAM T. RUSSELL
William T. Russell
Regional Administrator

Dated at King of Prussia, Pennsylvania
this 12th day of February 1990