

APPENDIX A

NOTICE OF VIOLATION

Hartford Steam Boiler Inspection  
and Insurance Company, Incorporated  
Essex, Connecticut 06426  
License No. 06-17156-01

Docket No. 30-12281

As a result of the inspection conducted on April 22-23, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 30.34(c) requires that you confine your possession and use of byproduct materials to the locations and purposes authorized by your license. Conditions 6 and 7 of your license limit the physical form of the byproduct material that you may possess. Prior to March 13, 1981, Conditions 6 and 7 of your license limited your possession of cobalt-60 to Technical Operations Model A-424-14 sealed sources.

Contrary to this requirement, on October 12, 1980, you received a cobalt-60 Gamma Industries Model A-7-A sealed source from your branch office in Houston, Texas, a source you were not authorized to possess prior to Amendment No. 06 of your license, dated March 13, 1981.

This is a Severity Level IV Violation (Supplement VII).

- B. Condition 16 of your license requires that licensed materials be possessed and used in accordance with statements, representations and procedures contained in your application dated April 2, 1979.

Item 6.11(5) of the procedure entitled "Movement of Exposure Devices" in your Radiation Safety Manual requires, when sources are transported to off site locations, that the radiation level not exceed 0.5 millirem per hour at 2 inches from the outer surface of the vehicle.

Contrary to this requirement, on the date of the inspection, April 22, 1981, a vehicle used to transport your Model Gammatron 50A exposure device to an off site location was surveyed by our inspector and had a radiation level of 4.5 millirem per hour at 2 inches from the outer surface of the vehicle.

This is a Severity Level V Violation (Supplement VII).


- C. 10 CFR 71.5 requires that you transport licensed material outside the confines of your plant in compliance with 49 CFR Parts 170-189. 49 CFR 173.394(b) requires that Type B quantities of special form radioactive materials be packaged in a Type B packaging approved by the U.S. Nuclear Regulatory Commission. 49 CFR Part 173.393(a) requires that each shipper have a copy of the USNRC approval and the documents referred to in the approval in his possession.

Contrary to this requirement, as of the day of the inspection, April 22-23, 1981, you did not have in your possession copies of the NRC Certificate of Compliance for the Type B packages in which you ship your Gamma Industries Model Gammatron 50A exposure device.

This is a Severity Level VI Violation (Supplement V).

Pursuant to the provisions of 10 CFR 2.201, Hartford Steam Boiler Inspection and Insurance Company, Incorporated is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated 26 JUN 1981

  
James H. Joyner, Chief, Technical  
Inspection Branch, Division of  
Engineering and Technical Inspection