

APPENDIX A

NOTICE OF VIOLATION

Dames and Moore  
1144 - 10th Avenue  
Honolulu, Hawaii 96816

License No. 53-19129-01

As a result of the inspection conducted on May 5, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. License Condition 12 states that licensed material shall be used by, or under the supervision and in the physical presence of those individuals named in the license.

Contrary to the above requirement, licensed material was utilized by an unauthorized individual on May 4, 1981, in Kaneohe at the Windward Mall location.

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

- B. License Condition 15 requires licensees to conduct a physical inventory every six months to account for all sealed sources received and possessed under the license.

Contrary to the above requirement, at the time of the inspection, no inventory had been performed since receipt of a gauge which contains a sealed source, on October 9, 1980.

This is a Severity Level V Violation (Supplement VII)

- C. License Condition 13 states that each sealed source containing licensed material, other than Hydrogen 3, with a half-life greater than 30 days and in a form other than gas shall be tested for leakage and/or contamination at intervals not to exceed 6 months.

Contrary to the above requirement, at the time of the inspection, no leak tests had been performed since receipt of the gauge on October 9, 1980.

This is a Severity Level V Violation (Supplement VII)

- D. 10 CFR 19.11(a) requires that the licensee post current copies of 10 CFR Parts 19 and 20, the license and documents incorporated into the license by reference, operating procedures, and any notices of violation.

Contrary to the above requirement, at the time of the inspection, neither the postings required by 19.11(a) nor the alternate posting authorized by 19.11(b) were posted at the licensee's facility.

This is a Severity Level VI Violation (Supplement VII)

E. 10 CFR 19.11(c) requires that the licensee post form NRC-3 "Notice to Employees" wherever individuals work in or frequent a restricted area.

Contrary to the above requirement, at the time of the inspection, a form NRC-3 was not posted near the locked wooden box which constitutes a restricted area in the basement where the device is stored.

This is a Severity Level VI Violation (Supplement VII)

F. 10 CFR 20.401 requires each licensee to maintain records showing the radiation exposures of all individuals whom personnel monitoring is required under 10 CFR 20.202.

Contrary to the above requirement, at the time of the inspection, records of personnel monitoring were not maintained for the months of February and March 1981.

This is a Severity Level VI Violation (Supplement VII)

Pursuant to the provisions of 10 CFR 2.201, Dames and Moore, Honolulu, Hawaii, 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 items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

dated June 26, 1981

*Wm. Mark Grayson*  
Wm. Mark Grayson  
Radiation Specialist