

APPENDIX A

NOTICE OF VIOLATION

Micromedic Systems, Inc.
Horsham, Pennsylvania 19044

Docket No. 30-11643
License No. 37-16707-01

As a result of the inspection conducted on January 30, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 20.201(b) requires that you make such surveys as may be necessary for you to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to this requirement, you failed to make such surveys as were necessary to assure compliance with 10 CFR 20.106, "Radioactivity in effluents to unrestricted areas", a regulation that limits the yearly average concentration of iodine-125 contained in the air discharged to unrestricted areas. We note that surveys were made which were intended to meet this requirement, but these surveys were inadequate in that you failed to convert from counts per minute on a test sample to concentrations of iodine-125 in microcuries per milliliter of air and no evaluations were made of the average annual concentration of iodine-125 in your discharge stack.

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

- B. Condition 14 of your license requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in certain referenced applications and letters. One of these letters is dated April 4, 1978.

Item II.D. (page 0-4) of this letter requires that you perform thyroid bioassays on personnel at specified frequencies.

Contrary to this requirement, as of the day of the inspection, January 30, 1981, you failed to conduct thyroid bioassays at the required frequencies. In addition, you failed to evaluate the adequacy of your counting arrangement when the background varied significantly over time.

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

- C. 10 CFR 71.5 requires that transportation of licensed materials be made in accordance with the applicable requirements of the Department of Transportation in 49 CFR 170-189.

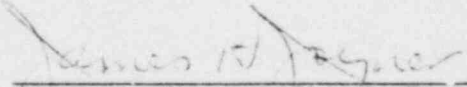
49 CFR 173.393(i) requires that, prior to each shipment of any package, the shipper ensure by examination or appropriate test that the external radiation and contamination levels are within allowable limits.

Contrary to these requirements, on the day of the inspection, January 30, 1981, you failed to make a direct radiation survey to determine the radiation dose rate on the external surface of the package and the transport index (radiation dose rate at 3 feet from the external surface of the package) of radioactive waste shipped from your facility.

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

Pursuant to the provisions of 10 CFR 2.201, Micromedic Systems, Inc. is hereby required to submit to this office within twenty-five 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 March 16, 1981


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