

APPENDIX A

NOTICE OF VIOLATION

E. L. Conwell and Company
Philadelphia, Pennsylvania 19103

Docket No. 30-13105
License No. 37-17637-01

As a result of the inspection conducted on March 3, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. Condition 16 of your license requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in your application dated June 24, 1977 and letter dated October 13, 1977.

Item a.4 of the "General Instructions" included in Attachment 6.e of your June 24, 1977 application requires that the radiographer, during his daily inspection of his equipment, check the source tube and drive cable for wear or damage.

Contrary to this requirement, on the date of the inspection, March 3, 1981, a radiographer in your employ failed to check the pigtail connector on the drive cable for wear or damage. The NRC inspectors noted that this connector had worn through and was in use by the radiographer at the time of the inspection.

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

- B. 10 CFR 34.43(b) requires that a survey be made after each radiographic exposure to determine that the sealed source has been returned to its shielded position. The entire circumference of the radiographic exposure device must be surveyed and if the device has a source guide tube, the survey must include the entire length of the guide tube.

Contrary to this requirement, on the day of the inspection, March 3, 1981, one of your radiographers failed to perform a survey that was adequate to determine that the sealed source had returned to its shielded container. We note that a survey which was intended to meet this requirement was performed, but was inadequate in that it did not include the entire circumference of the exposure device and the entire length of guide tube.

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

- C. 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, on the day of the inspection, March 3, 1981, you failed to make such surveys as were necessary to assure compliance with 10 CFR 20.105(b), "Permissible levels of radiation in unrestricted areas." Specifically, you failed to make surveys in an apartment building outside the restricted area of your field radiography site.

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

- D. 10 CFR 19.12 requires that you instruct all individuals working in your restricted areas in the applicable provisions of the Commission's regulations and licenses.

Contrary to this requirement, as of the day of the inspection, March 3, 1981, four individuals who were working in your restricted area had not been adequately instructed in the applicable provisions of the regulations and the conditions of your license. Specifically, they were not adequately instructed in the requirements for daily inspection of equipment, proper surveys of the device at the conclusion of an exposure, surveys in unrestricted areas, and the use of collimators.

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

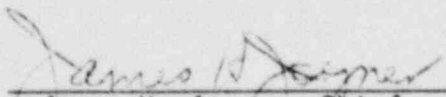
- E. 10 CFR 34.28 requires that you conduct a program for inspection and maintenance of radiographic exposure devices, storage containers, and source changers at intervals not to exceed three months.

Contrary to this requirement, as of the date of the inspection, March 3, 1981, you had failed to inspect your radiographic exposure devices since November 7, 1981, a period in excess of three months.

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

Pursuant to the provisions of 10 CFR 2.201, E. L. Conwell and Company 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 15 APR 1981


James H. Joyner, Chief
Technical Inspection Branch