

NOTICE OF VIOLATION

Pittsburgh-Des Moines Steel Company

Docket: 030-03619
License: 04-02289-04

As a result of the inspection conducted on June 15-16, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 34.11(d) requires that each applicant granted a license to perform radiography will have an internal inspection system adequate to assure that Commission regulations, Commission license provisions, and the applicant's operating and emergency procedures are followed by radiographers and radiographers' assistants; the inspection system shall include the performance of internal inspections at intervals not to exceed three months and the retention of records of such inspections for two years.

Contrary to this requirement, and excepting the performance test documented on a single radiographer on February 25, 1981, no other such internal inspections have been performed during the period since the last inspection on March 6, 1979.

This is a Severity Level V violation (Supplement VII.E).

2. 10 CFR 20.408 requires, in part, that when an individual terminates employment with a licensee, the licensee shall furnish to the Nuclear Regulatory Commission, a report of the individual's exposures to radiation incurred during their period of employment. Such reports shall be furnished within 30 days after the exposure has been determined by the licensee or 90 days after the date of termination, whichever is earlier.

Contrary to this requirement, reports were not submitted to the Commission of the exposures incurred by five individuals who have terminated since March 1979.

This is a Severity Level VI violation (Supplement VII.F).

3. 10 CFR 20.409 requires, in part, that when a licensee is required pursuant to 10 CFR 20.408 to report to the Commission any exposure of an individual to radiation, the licensee shall also notify the individual. Such notice shall be transmitted at a time not later than the transmittal to the Commission.

Contrary to this requirement, the exposures incurred by five individuals who have terminated since March 1979 have not been reported to these individuals.

This is a Severity Level VI violation (Supplement VII.F).

4. 10 CFR 34.33(c) requires that pocket dosimeters shall be checked at periods not to exceed one year for correct response to radiation.

Contrary to this requirement, no response checks have been performed during the period since the last inspection on March 6, 1979.

This is a Severity Level VI violation (Supplement VII.F).

5. 10 CFR 20.407(a) requires, in part, that each licensee authorized to possess and use byproduct material for purposes of radiography shall, within the first quarter of each calendar year, submit a report to the Nuclear Regulatory Commission covering the preceding calendar year, of either; (1) the number of individuals for whom personnel monitoring was required; or (2) the number of individuals for whom personnel monitoring was provided.

Contrary to this requirement, no such report was submitted in the first quarter of 1980 covering calendar year 1979.

This is a Severity Level VI violation (Supplement VII.F).

6. 10 CFR 20.407(b) requires, in part, that each licensee authorized to possess and use byproduct material for purposes of radiography shall, within the first quarter of each calendar year, submit a report to the Nuclear Regulatory Commission covering the preceding calendar year, which contains a statistical summary of the personnel monitoring information, and indicates the number of individuals whose total whole body exposures fell within specified ranges.

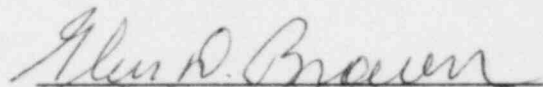
Contrary to this requirement, no such report was submitted in the first quarter of 1980 covering calendar year 1979.

This is a Severity Level VI violation (Supplement VII.F).

Pursuant to the provisions of 10 CFR 2.201, Pittsburgh-Des Moines Steel Company is hereby required to submit to this office within 30 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) the 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. Consideration may be given to extending your response time for good cause shown. The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

JUL 14 1981

Dated _____



Glen D. Brown, Chief
Technical Inspection Branch