

APPENDIX A

NOTICE OF VIOLATION

Department of the Navy  
Naval Submarine Base  
Repair Department 705  
Pearl Harbor, Hawaii 96860

License No. 53-10226-01

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. 10 CFR 34.11(d) states that each applicant 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 the above requirement, no records of internal inspections were available between the last inspection on July 10-11, 1980 and December 30-31, 1980. This repetitive item of noncompliance was also identified in the inspection conducted on July 10-11, 1980. Licensee correspondence dated October 31, 1980 indicated that an internal audit was conducted in August of 1980, but no record of this audit was available at the time of the May 5, 1980 inspection.

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

- B. 10 CFR 34.33(b) states that pocket dosimeters shall be read and recorded daily.

Contrary to the above requirement, daily pocket dosimeter readings were not maintained for a radiographer who performed radiography on 1/13/81, 1/15/81, 1/16/81, and 1/23/81. This repetitive item of noncompliance was also identified during the July 10-11, 1980 inspection.

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

- C. 10 CFR 34.24 states that each radiation survey instrument shall be calibrated at intervals not to exceed three months.

Contrary to the above requirement, radiation survey instruments serial numbers E0994 and 7.54 were calibrated on November 26, 1980 yet were utilized while they were overdue for calibration on March 3, March 4, March 11, and 25, 1981.

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

- D. 10 CFR 34.29(c) requires that alarm systems in permanent radiographic installations be tested at intervals not to exceed 3 months.

Contrary to the above requirement, the alarm system was not tested between October 9, 1980 and April 1, 1981 yet radiography was performed on February 3, February 9, February 13, and March 3, 1981.

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

- E. License Condition No. 16 (Amendment No. 13) incorporates revised Operating and Emergency Procedures, as described in SUBASE INST 9900.2B dated April 7, 1980 which was submitted as a supplement to the license application. Chapter 2 item 2(c) of this procedure states that the outer surface of the vault in Building 1341 should be treated as an unrestricted area, and that external radiation levels be checked by physical radiation survey bi-annually using an uncollimated 100 Ci, Iridium-192 source.

Contrary to the above requirement, no bi-annual surveys were performed between March 31, 1980 and May 5, 1981.

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

- F. 10 CFR 19.11(a) requires each licensee to post current copies of 10 CFR Parts 19 and 20, the license and documents incorporated into the license by reference and amendments thereto, operating procedures applicable to licensed activities, and any notices of violation.

Contrary to the above requirement, 10 CFR Parts 19 and 20 and documents incorporated into the license by reference were neither posted outside the permanent radiographic facility nor was the alternate posting authorized by 19.11(b) present.

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

Pursuant to the provisions of 10 CFR 2.201, the Naval Submarine Base Pearl Harbor, 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.

The responses directed by this Notice are not subject to the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

JUL 14 1981

dated \_\_\_\_\_

*Original Signed by  
Wm. Mark Grayson*

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Wm. Mark Grayson  
Radiation Specialist