

Appendix A

NOTICE OF VIOLATION

BASF Wyandotte Corporation

License No. 21-00627-02

As a result of the inspection conducted on August 28, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. License Condition No. 17 requires that you test your sealed sources containing licensed material for leakage and/or contamination at intervals not to exceed six months. Records of leak test results shall be kept in units of microcuries and maintained for inspection by the Commission.

Contrary to this requirement, you failed to test your americium-241 well logging source for contamination or leakage from January 23, 1980 to January 29, 1981 and failed to maintain records of leak test results subsequent to January 29, 1981.

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

2. License Condition No. 21 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in various dated applications and letters.

Letter dated April 30, 1979, states that after completion of each major project and at least twice a year, the RSO will perform wipe tests of floor and bench areas to check for contamination.

Contrary to the above, wipe tests have not been performed since inception of this requirement.

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

3. 10 CFR 20.401(a) requires that you maintain records showing the radiation exposures of all individuals for whom personnel monitoring is required under 20.202 of the regulations in this part.

Contrary to this requirement, as of the day of the inspection, you failed to maintain records of radiation exposure to research lab personnel from April 13 to August 3, 1980, from August 17 to August 31, 1980, from February 2 to February 15, 1981, and from May 25 to June 21, 1981. Also, you failed to maintain records of radiation exposure to brine well personnel from July 23 to August 5, 1979, from June 9 to July 6, 1980, and from September 1 to September 14, 1980.

This is a Severity Level VI violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; 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.

9-14-81
Dated

S. R. Jasuk
for D. J. Sreniawski, Chief
Materials Radiation Protection
Section 2