

Appendix A

NOTICE OF VIOLATION

The Massillon Steel Casting
Company

License No. 34-02605-01

As a result of the inspection conducted on June 2, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 34.43(a) requires that at least one calibrated and operable radiation survey instrument be available at the location of radiographic operations whenever radiographic operations are being performed.

Contrary to this requirement, the Victoreen Model 592B survey meter which was used during radiographic operations was not calibrated in accordance with this requirement. Specifically, the calibration records show that on December 18, 1979 your calculated radiation level at 37 inches from a 44 millicurie cobalt-60 source was 300 mR/hr. However, the actual calculated radiation level on that date from this source was 67 mR/hr. In addition, cobalt-60 radioactive decay was improperly calculated for all instrument calibrations performed in 1980 and 1981.

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

This is a repeat violation.

2. 10 CFR 34.29(b) requires that each entrance used for personnel access to the high radiation area in a permanent radiographic installation have both visible and audible warning signals to warn of the presence of radiation. The visible signal must be activated by radiation whenever the source is exposed and the audible signal must be activated when an attempt is made to enter the installation while the source is exposed.

Contrary to this requirement, as of the day of the inspection, June 2, 1981, the permanent radiographic installation located in your facility did not have the required audible signal activated in the manner prescribed.

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

3. 10 CFR 34.25(b) requires that you test each sealed source for leakage at intervals not to exceed six months.

Contrary to this requirement, a leak test had not been performed on your cobalt-60 sources (Serial Nos. 1332 and 269) between March 17, 1980 and January 13, 1981, a period in excess of six months.

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

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

Contrary to this requirement, as of the day of the inspection, June 2, 1981, you have failed to perform the required check for correct response to radiation on pocket dosimeters used at your facility.

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

5. 10 CFR 34.26 states that each licensee shall conduct a quarterly physical inventory to account for all sealed sources received and possessed under his license. The inventory record is to include certain required information.

Contrary to this requirement, inventory records did not include the kind of byproduct material nor the location of sealed sources.

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

6. 10 CFR 20.408(b) and 20.409(b) require that you make a report to the Commission, and to the individual involved, of the radiation exposure of each individual who has terminated employment.

Contrary to this requirement, as of the day of the inspection, June 2, 1981, you have failed to provide the required report to the Commission, or to the individuals involved, for two individuals who terminated employment in 1979 and 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.

AUG 24 1981
Dated

C. E. Norelius
C. E. Norelius, Director
Division of Engineering and
Technical Inspection

Appendix B

MANAGEMENT CONTROL

In order to provide you with some guidance in assessing the adequacy of your management control program, the NRC Region III office provides the following as the acceptance criteria for adequate management control for materials licensees. "Management Control" is a system instituted by management to assure that licensed activities are performed safely and in accordance with regulatory requirements (license conditions and applicable regulations).

This will include:

- a. Delineation of duties and responsibilities of all persons involved in licensed activities.
- b. Providing for indoctrination and training of all personnel performing licensed activities, specifically in those areas directly affecting compliance with NRC regulations and license conditions.
- c. Verification, as by checking, auditing and inspecting, that activities affecting safety related functions have been correctly performed. The verifying process should be performed by individuals or groups other than those performing the safety related procedures.
- d. Insuring continued compliance of licensed activities throughout periods during which routine activities may be interrupted, such as changes in equipment, personnel or facilities.

Because of the many variables involved, such as the number of personnel, type of activity being performed and the location or locations where activities are performed, the organizational structure for executing the management control program may take various forms; however, irrespective of the organizational structure, the individual or group responsible for this control should have the flexibility and authority to institute changes or corrections as required to maintain compliance with NRC regulations and license conditions.