

APPENDIX A

NOTICE OF VIOLATION

Arnold Greene Testing Laboratories
Natick, Massachusetts 01760

Docket No. 030-04594
License No. 20-01074-02

As a result of the inspection conducted on January 31, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1988), the following violations were identified:

- A. 10 CFR 34.41 requires that during each radiographic operation, the radiographer or radiographer's assistant maintain direct surveillance of the operation to protect against unauthorized entry into a high radiation area.

Contrary to the above, on January 31, 1989, at a field site in North Hampton, Massachusetts, direct surveillance over a radiographic operation was not maintained. Specifically, the two radiographers stood in a lunch area while the source was exposed and neither could see the access point to the high radiation area.

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

- B. 10 CFR 34.22(a) requires that, during radiography operations, the sealed source assembly be secured in the shielded position each time the source is returned to that position.

Contrary to the above, on January 31, 1990, a sealed source assembly was not secured, following return of the source to the shielded position, at the termination of a radiographic exposure.

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

- C. Condition 16 of License No. 20-01074-02 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated November 21, 1985, and letter dated September 9, 1986.

1. Item G of Attachment E to application dated November 21, 1985, requires that, persons previously qualified as radiographers with another organization, satisfactorily pass a written examination prior to performing as a radiographer.

Contrary to the above, as of January 31, 1990, an individual who previously qualified as a radiographer with another organization, did not satisfactorily pass a written examination, and was performing the duties of a radiographer.

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2. Item J.1 of letter dated September 9, 1986, requires that each radiographer and radiographer's assistant be audited during actual radiographic operation once every 90 days.

Contrary to the above, as of January 31, radiographic personnel were not being audited once every 90 days. Specifically, radiographic personnel in the Springfield office were not audited in 1989.

These are Severity Level IV violations. (Supplement VI)

Pursuant to the provisions of 10 CFR 2.201, Arnold Greene Testing Laboratories is hereby required to submit to this office within thirty days of the date of the letter which transmitted 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. Where good cause is shown, consideration will be given to extending this response time.