

APPENDIX

NOTICE OF VIOLATION

Ramsey Construction and Fabricating  
Co., Inc.

Docket: 30-17697  
License: 35-19433-01

As a result of the inspection conducted on January 27, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 667554 (October 7, 1980), the following violations were identified:

1. 10 CFR 34.33(c) requires, in part, that pocket dosimeters shall be checked at periods not to exceed one year for correct response to radiation.

Contrary to this requirement, pocket dosimeters used by the licensee had not been checked for correct response to radiation during the period January 1981 to January 1982.

This is a Severity Level IV Violation (Supplement VII.D.2)

2. 10 CFR 71.5(a) requires, in part, that no licensee shall transport any licensed material outside of the confines of his plant or other place of use, or deliver any licensed material to a carrier for transport, unless the licensee complies with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation in 49 CFR Parts 170-189.

- a. 49 CFR 173.393a(a)(1) requires, in part, that before the first shipment in a package approved by the U.S. Nuclear Regulatory Commission for use by another person, each shipper shall register in writing with the USNRC, Division of Materials Licensing, his name and address, the name of the person to whom the USNRC approval was issued, and the approval number assigned to the package.

Contrary to this requirement, the licensee did not register prior to using Source Production and Equipment Company model 2T exposure devices and Source Production and Equipment Company model G-1 source changers during the period January 1981 to January 1982.

- b. 49 CFR 173.398(a), Note 1, requires, in part, that each shipper of special form radioactive material shall maintain a file for at least one year after the last shipment, a complete certification and supporting analysis demonstrating that the special form material meets the requirements of paragraph (a) of that section.

Contrary to the requirement, such records were not maintained for transport of special form radiography sources during the period January 1981 and January 1982.

This is a Severity Level IV Violation (Supplement VII.D.1).

3. 10 CFR 20.102 requires that the licensee shall require each individual, prior to the first entry into the licensee's restricted area under such circumstances that the individual is likely to receive in any period of one calendar quarter an occupational dose in excess of 25 percent of the standards specified in 20.101(a), to disclose in a written, signed statement, either (1) that the individual had no prior occupational dose during the current calendar quarter, or (2) the nature and amount of any occupational dose which the individual may have received during that specifically identified current calendar quarter from sources of radiation possessed or controlled by other persons.

Contrary to this requirement, such signed statements were not obtained from individuals hired in September and October 1981.

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

4. 10 CFR 20.408 requires, in part, that when an individual terminates employment with a licensee that the licensee shall furnish to the USNRC a report of the individual's exposure to radiation and radioactive material incurred during the period of employment.

Contrary to this requirement, such reports were not submitted for individuals who terminated their employment with the licensee during the period January 1981 to January 1982.

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

Pursuant to the provisions of 10 CFR 2.201, Ramsey Construction & Fabrication Company, Inc., 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.

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Dated \_\_\_\_\_

  
Glen D. Brown, Chief  
Technical Inspection Branch