

APPENDIX A

NOTICE OF VIOLATION

Kearfott Guidance and Navigation Corporation
Wayne, New Jersey 07474

Docket No. 030-13744
License No. 29-07685-05

As a result of the inspection conducted on August 23, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1990), the following violations were identified:

- A. 10 CFR 20.201(b) requires that each licensee make such survey as may be necessary to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, as of August 23, 1990, surveys were not made to assure compliance with that part of 10 CFR 20.101 that limits the radiation exposure to the whole body. Specifically, a radiation worker who was not wearing personal dosimetry (film badge) entered a restricted area and radioactive material storage area without the use of a survey instrument.

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

- B. Condition 16 of License No. 29-07685-05, requires the licensee to conduct a physical inventory every 6 months to account for all sources and devices received and possessed under the license. Records of inventories shall be maintained for 3 years.

Contrary to the above, on August 23, 1990, a review of the licensee's records showed that physical inventories were performed during November 1987 and January 1990, not within 6 month intervals.

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

- C. Condition 18 of License No. 29-07685-05, requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in an application dated July 19, 1978.

1. Schedule D. Item 11 of the application requires that all survey instruments be calibrated after repair and at 6 month intervals.

Contrary to the above, as of August 23, 1990, radiation survey instruments were not calibrated at 6 month intervals. Calibration records for two instruments were dated January 1987 and May 1990 for one and June 1990 for the other.

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

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2. Schedule E, Item 14, of the application requires that surveys of radioactive materials (irradiated components) be conducted at 6 month intervals. Surveys are also to be conducted while working with a component during mechanical or electrical testing.

Contrary to the above, as of August 23, 1990, records of surveys conducted on irradiated components were not available to verify compliance.

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

- D. Condition 13.C. of License No. 29-07685-05 requires that sealed sources or detector cells containing byproduct material be tested for leakage and contamination at intervals not to exceed 6 months. Schedule E, Item 14, of the application dated July 18, 1978, also requires that leak testing of detector cells be conducted at 6 month intervals.

Contrary to the above, on August 23, 1990, records reviewed showed that leakage and contamination testing of Tracor gas chromatograph detector cells was not conducted at 6 month intervals. Leakage and contamination testing was last conducted during November 1988.

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

- E. 10 CFR 20.203(e) requires that rooms in which specified amounts of licensed material are used or stored be conspicuously posted "Caution Radioactive Material."

Contrary to the above, on August 23, 1990, the room in which INFS Goniometers, containing about 2 curies each of tritium, were stored was not posted "Caution Radioactive Material."

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

Pursuant to the provisions of 10 CFR 2.201, Kearfott Guidance and Navigation Corporation 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.

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- A. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with all sections of Part 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, as of August 23, 1990, surveys were not made to assure compliance with that part of 10 CFR 20.101 that limits the radiation exposure to the whole body. Specifically, a radiation worker who was not wearing personal dosimetry (film badge) entered a restricted area and radioactive material storage area without the use of a survey instrument.

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

- B. Condition 16 of License No. 29-07685-05, requires the licensee to conduct a physical inventory every 6 months to account for all sources and devices received and possessed under the license. Records of inventories shall be maintained for 3 years.

Contrary to the above, on August 23, 1990, a review of the licensee's records showed that physical inventories were performed during November 1987 and January 1990, not within 6 month intervals.

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- C. Condition 18 of License No. 29-07685-05, requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in an application dated July 19, 1978.

1. Schedule D. Item 11 of the application requires that all survey instruments be calibrated after repair and at 6 month intervals.

Contrary to the above, as of August 23, 1990, radiation survey instruments were not calibrated at 6 month intervals. Calibration records for two instruments were dated January 1987 and May 1990 for one and June 1990 for the other.

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2. Schedule E, Item 14, of the application requires that surveys of radioactive materials (irradiated components) be conducted at 6 month intervals. Surveys are also to be conducted while working with a component during mechanical or electrical testing.

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Contrary to the above, on August 23, 1990, records reviewed showed that leakage and contamination testing of Tracor gas chromatograph detector cells was not conducted at 6 month intervals. Leakage and contamination testing was last conducted during November 1988.

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