

APPENDIX A

NOTICE OF VIOLATION

Globe X-Ray Services, Inc.

Docket: 30-08719  
License: 35-15194-01

As a result of the inspection conducted on May 26-27, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982), the following violations were identified:

1. License Conditions 7 and 8 authorize the possession and use of one Technical Operations Model 72602, sealed source not to exceed 100 millicuries of cesium-137.

Contrary to this requirement, the licensee possessed an additional sealed source, Victoreen Model 06-200, containing 90 microcuries of cesium-137 on May 26, 1982.

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

2. 10 CFR 20.101(a) limits the whole body exposure of an individual in a restricted area to 1.25 rems per calendar quarter, except as provided by 10 CFR 20.101(b). Paragraph (b) allows a whole body exposure of 3.0 rems per calendar quarter provided certain specified conditions are met.

Contrary to this requirement, the exposure of an individual was not limited to 3.0 rems during the second quarter of 1981. Specifically, a whole body dose of 3.05 rems was recorded for a radiographer during the second quarter of 1981.

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

3. 10 CFR 20.207(a) requires that licensed materials stored in an unrestricted area be secured against unauthorized removal from the place of storage.

Contrary to this requirement, radiography devices containing licensed material were stored in licensee vehicles under conditions which did not provide security against unauthorized removal. Specifically, keys providing access to the vehicle storage room, outer enclosure, and lock for the radiography device were found in six unlocked vehicle cabs on May 26, 1982.

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

4. 10 CFR 34.22(a) requires, in part, that each radiographic exposure device or its outer container shall be kept locked when not under the direct surveillance of a radiographer or a radiographer's assistant.

Contrary to this requirement, the inspector observed that two radiographic exposure devices were not locked while stored in vehicles on May 26, 1982.

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

5. 10 CFR 71.5(a) requires, in part, that no licensee shall transport any licensed material outside 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 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 172.200(a) requires, in part, that each person who offers a hazardous material for transportation shall describe the hazardous material on the shipping paper in the manner required by Subpart C of Part 172.

Contrary to this requirement, shipping papers had not been provided for packages containing Type B quantities of radioactive material transported on public highways of the State of Oklahoma during the period May 6, 1981, to May 26, 1982.

- (b) 49 CFR 173.25(b) requires, in part, that authorized packages being shipped in outside containers must have the containers marked with the proper shipping name and labeled as required by subchapter C of Title 49. The outside containers must also be marked "INSIDE PACKAGES COMPLY WITH PRESCRIBED SPECIFICATIONS" when specification packages are used.

Contrary to this requirement, outside containers enclosing DOT specification Type B packages of radioactive material were not labeled in accordance with 49 CFR 173.25 on May 27, 1982.

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

Contrary to this requirement, the licensee did not have the certification for special form licensed material shipped on public highways in the State of Oklahoma during the period May 6, 1981, to May 27, 1982.

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

Pursuant to the provisions of 10 CFR 2.201, Globe X-Ray 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.

Consideration may be given to extending your response time for good cause shown.

Dated July 22, 1982