

APPENDIX A

NOTICE OF VIOLATION

Interstate Nuclear Services
Indian Orchard, Massachusetts 01157

Docket No. 30-04632
License No. 20-03529-01

As a result of the inspection conducted on May 27 and 28, 1982 and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 20.101(a) limits the whole body exposure of an individual in a restricted area to one and one quarter rems per calendar quarter, except as provided by 10 CFR 20.101(b). Paragraph (b) allows a whole body exposure of three rems per calendar quarter provided specified conditions are met.

Contrary to the above, four individuals working in the restricted area received a whole body radiation dose of 1.54, 1.75, 1.72, and 1.53 rem, respectively, during the third calendar quarter of 1980 and the conditions of paragraph (b) were not met.

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

- B. 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.

1. Contrary to the above, as of May 28, 1982, no surveys (evaluations) were made to assure compliance with 10 CFR 20.101, a regulation which limits radiation dose to individuals in restricted areas. Specifically, no evaluations were made of the dose to the whole body of employees whose film badges registered exposures of 1.54, 1.75, 1.72, and 1.53 rem during the third quarter of 1980, and 1.46, 1.48 and 1.87 rem during the second quarter of 1981.

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

2. Contrary to the above, as of May 28, 1982, no surveys (evaluations) were made to assure compliance with 10 CFR 20.101. Specifically, personnel monitoring was not provided to evaluate the dose to the extremities of an employee when he began working in the restricted washroom area on March 1, 1982.

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

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- C. 10 CFR 19.12 requires that all individuals working in a restricted area be instructed in the precautions and procedures to minimize exposure to radioactive materials, in the purpose and functions of protective devices employed, and in the applicable provisions of the Commission's regulations and licenses.

Contrary to the above, as of May 28, 1982, individuals working in the washroom and folding and monitoring areas had not been instructed in the proper procedures for using a survey meter (a protective device) and the procedures for adequately monitoring for personnel contamination prior to leaving restricted areas.

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

- D. Condition 20 of License No. 20-03529-01 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in the application dated January 12, 1977 and in various letters, one of which is dated January 16, 1981.

Item VI of this letter requires that personnel working in the nuclear washroom have a semi-annual bioassay performed.

Contrary to the above, as of May 28, 1982, personnel working in the nuclear washroom last had a bioassay performed on September 23, 1981, a period greater than semi-annual.

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

Pursuant to the provisions of 10 CFR 2.201, Interstate Nuclear Services is hereby required to submit to this office within thirty 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) 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 your response time.