

NOTICE OF VIOLATION

Monsanto Company, BBIC
Environmental Services
St. Louis, MO 63198

License No. 24-01113-24
Docket No. 030-30241

During an NRC inspection conducted on January 20, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

1. Condition No. 13 of License No. 24-01113-24 requires that the licensee conduct its program in accordance with statements, representations and procedures contained in certain referenced applications and letters. The application dated October 2, 1987, Item 10, page 7, Personnel Monitoring, states that all Environmental Services personnel involved in the radwaste program shall wear a TLD or film badge approved by NVLAP.

Contrary to the above, on January 20, 1994, Environmental Services contract personnel involved in the radwaste program working at the Waste Handling Facility were not wearing a TLD or film badge.

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

2. Condition No. 13 of License No. 24-01113-24 requires that the licensee conduct its program in accordance with statements, representations and procedures contained in certain referenced applications and letters. The application dated October 2, 1987, Radwaste Receipt Section, page 1, states that each month, a list of the radwaste received from each research NRC license is sent to that license's RSO.

Contrary to the above, as of January 20, 1994, this requirement has not been performed as required.

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

3. Condition No. 13 of License No. 24-01113-24 requires that the licensee conduct its program in accordance with statements, representations and procedures contained in certain referenced applications and letters. The application dated October 2, 1987, Area Surveys Section, page 1, states that records of the survey will include the date and equipment used, a drawing of the area with the location and identification of each sample, the results of each sample, any actions taken to correct excessive dose rates or contamination and the signature of person conducting the survey.

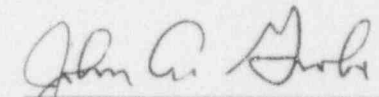
Contrary to the above, survey records did not include the signature of the individual conducting the survey.

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

Pursuant to the provisions of 10 CFR 2.201, Monsanto Company, BBIC Environmental Services is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, Region III, 801 Warrenville Road, Lisle, Illinois, 60532-4351, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

FEB 18 1994

Dated



John A. Grobe, Chief
Nuclear Materials Inspection
Section 2