

APPENDIX A

SEP 30 1982

NOTICE OF VIOLATION

EG&G Mason Research Institute
Worcester, Massachusetts 01608

Docket No. 30-04694
License No. 20-11085-01

As a result of the inspection conducted on July 30, 1982, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

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.

1. Contrary to the above, as of July 30, 1982, inadequate surveys were made to determine that individuals who handled millicurie quantities of iodine-125 were not exposed to airborne concentrations exceeding the limits specified in 10 CFR 20.103. Specifically, no calculations or evaluations of the results of physical measurements of airborne radioactivity conducted during iodinations were made. In addition, no routine thyroid monitoring of individuals performing iodinations was conducted since February 20, 1981.

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

2. Contrary to the above, as of July 30, 1982, surveys were not made to assure compliance with 10 CFR 20.106, a regulation that limits the concentration of iodine-125 and air discharged to unrestricted areas. Specifically, no surveys or evaluations were made of the concentrations of radioactive materials in the effluent air discharged from a hood where millicurie quantities of iodine-125 were processed at various intervals since December 18, 1980.

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

3. Contrary to the above, as of July 30, 1982, surveys (inventories) were not made to establish that licensed material was not inadvertently disposed of in a manner other than authorized by 10 CFR 20.301, a regulation which describes authorized means of disposing of licensed material contained in waste. Specifically, no surveys were performed to assure that materials disposed of in the normal waste did not contain measurable amounts of iodine-125 after being held for decay for only 60 days.

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

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

Contrary to the above, as of July 30, 1982, individuals working in the restricted areas had not been instructed in the applicable provisions of the regulations and conditions of the license.

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

- C. Condition 15 of License No. 20-11085-01 requires that licensed material be possessed and used in accordance with statements, representation and procedures contained in an application dated June 16, 1977.

Item 14 of this application, entitled "Radiation and Protection Program," requires that work areas where radioactive materials are used be wipe tested monthly.

Contrary to the above, as of July 30, 1982, no wipe tests of the laboratories where iodine-125 was used have been performed since January, 1981.

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

Pursuant to the provisions of 10 CFR 2.201, EG&G Mason Research Institute 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 this response time.