

APPENDIX

NOTICE OF VIOLATION

Star-Jet Services, Inc.
Oklahoma City, Oklahoma

Docket: 30-09664/90-01
License: 35-15727-01

During an NRC inspection conducted on August 20-21, 1990, 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 (1990) (Enforcement Policy), the violations are listed below:

A. License Condition 14 requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the application dated January 31, 1984, including any enclosures provided with the application. The licensee's Operating and Emergency Procedures Manual (Manual) was provided as an enclosure with the application.

1. Item II.D.1 of the Manual requires, in part, that bioassays be performed whenever an individual handles more than 50 millicuries of liquid iodine at any one time.

Contrary to the above, bioassays were not performed for individuals who handled vials containing greater than 50 millicuries of iodine-131 on September 25, 1989, and April 7, 1990. (These individuals had used the open vials containing approximately 60 millicuries of iodine-131 while dispensing tracer material for logging jobs on these dates.)

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

2. Item I.A.7 of the Manual specifies that the radiation safety officer (RSO) is responsible for providing monthly checks on all radiation handlers to ensure proper compliance with all state and federal regulations.

Contrary to the above, between April 1988 and August 1990, monthly checks on radiation handlers had not been provided.

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

3. Item II.B.4 of the Manual specifies, in part, that calibration checks of radiation survey meters shall consist of testing the survey meter at two points, other than zero, on each scale.

Contrary to the above, two survey meters, Serial Nos. 2798 and 4664, had not been tested at two points on each scale during calibration checks conducted on February 26, 1988, and September 15, 1989, respectively.

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

4. Item VII.B.2 of the Manual specifies, in part, that radioactive waste materials will be retained in a designated area at the licensee's facility until it can be disposed of (by decay-in-storage) and that records of surveys made prior to disposal will be maintained.

Contrary to the above, between April 1988 and August 1990, the licensee had failed to maintain disposal records which included disposal survey results for iodine-131 waste which had been disposed of by decay-in-storage.

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

5. Item X.C of the Manual specifies that when a (sealed) source is removed from the storage bunker, it will be logged out on the source utilization log and further requires that a survey be made of the source at a distance of 6 inches from the source container. (The source utilization log requires that the survey reading be recorded.)

Contrary to the above, americium-241 sealed sources were not logged out nor were log out survey results recorded on the licensee's source utilization log for two dates in April 1989, two dates in May 1988, and one date in April 1989, when the sources had been used to conduct well logging.

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

6. Item I.B.4(e) specifies that records of physical inspection of source assemblies, containers, and tools, will be maintained at the licensee's facility.

Contrary to the above, records of semiannual maintenance inspections of source assemblies, containers, and tools; conducted in November 1989, and March and May 1990, had not been maintained.

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

- B. 10 CFR 20.201(b) requires that each licensee make or cause to be made such surveys as: (1) may be necessary for the licensee to comply with the regulations in 10 CFR Part 20, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. 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.

10 CFR 20.101(a) generally limits the permissible occupational exposure to the whole body to $1\frac{1}{2}$ rems per calendar quarter.

Contrary to the above, the radiation exposure records for individuals authorized as logging supervisors during August 1989, indicated that personal monitoring devices had been damaged during return to the

licensee's vendor for processing; and as of August 21, 1990, the licensee had not performed evaluations to determine the radiation exposure received by these individuals.

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

- C. 10 CFR 39.67(f) specifies that results of surveys required under 10 CFR 39.67(a) through (e) must be recorded and that records must include, among other items, identification of the survey instrument used to perform the survey. The licensee shall retain records of surveys for inspection by the Commission for 3 years after they are made.

Contrary to the above, the licensee had failed to maintain records of vehicle surveys conducted prior to transporting licensed materials on April 2 and 7, 1989; and July 22, 1990. Additionally, records of surveys conducted before and after subsurface tracer studies did not include identification of the survey instrument used in every case.

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

- D. 10 CFR 71.5(a) requires that licensees who transport licensed material outside the confines of their plants or deliver licensed material to a carrier for transport comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 170-189.

49 CFR 172.403(g)(1) and (2) require that package labels contain the name of the radionuclides enclosed and the activity content expressed in curie units.

Contrary to the above, neither the name of the radionuclides enclosed or activity content had been included on package labels for a package transported in August 1990 from the licensee's facility to a temporary jobsite. (The package contained millicurie quantities of iodine-131 and had been correctly categorized and labeled as a RADIOACTIVE YELLOW III package.)

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

Pursuant to the provisions of 10 CFR 2.201, Star-Jet Services, Inc., is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement of explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 24th day of September 1990

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