

APPENDIX

NOTICE OF VIOLATION

Uranium Resources, Inc.

Docket: 40-8786
License: SUA-1400

As a result of the inspection conducted on October 4 and 7, 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. 10 CFR 20.103(a)(3) requires that when assessment of a particular individual's intake of radioactive material is necessary, intakes less than those which would result from inhalation for 2 hours in any one day or for 10 hours in any one week at uniform concentrations specified in Appendix B, Table I, Column 1 of 10 CFR 20 need not be included in such assessment, provided that for any assessment in excess of these amounts the entire amount is included.

Contrary to this requirement, assessment of office workers' intake of radon-222 daughters was not performed for periods of office occupancy on March 3, 1982, when airborne concentrations of radon daughters were measured by the licensee to be equivalent to the Appendix B limit.

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

2. License Condition 33 requires, in part, that the licensee shall perform monthly surveys for airborne natural uranium and radon or radon progeny in the restricted area as a basis for determining time-weighted exposures for workers.

Contrary to this requirement, surveys for natural uranium were not performed during the first two months of operation (February and March 1982), and surveys for radon or radon progeny were not performed in office areas during April 1982.

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

3. License Condition 10 requires, in part, that licensed material be used in accordance with statements, representations, and conditions contained in the Technical Report supplement dated October 21, 1981. Section E-C-3 of the supplement states that alpha contamination in excess of 1000 dpm/100 cm² will be cause for decontamination and a documented investigation by the radiation safety staff.

Contrary to this requirement, since the beginning of operations during February 1982, such data were not converted from units of counts per

minute in order to enable comparison with the action limit. Also, survey results mathematically determined to be in excess of the action limit by the inspector had not resulted in a documented investigation by the radiation safety staff.

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

4. License Condition 31 requires, in part, that written procedures shall be reviewed and approved in writing by the Radiation Safety Officer or other expert with equivalent qualifications.

Contrary to this requirement, such approval had not been documented for procedures in use at the licensee's facility on October 7, 1982.

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

5. License Condition 35 requires, in part, that a report of each semiannual ALARA audit shall be submitted to the NRC.

Contrary to this requirement, such a report has not been submitted since the project commenced operation on February 8, 1982.

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

Pursuant to the provisions of 10 CFR 2.201, Uranium Resources, Inc., 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 NOV 26 1982

Coin, Charles L.

REVIEWER

INSPECTOR'S REPORT
 Office of Inspection and Enforcement

INSPECTORS

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT		NEXT INSP. DATE	
			NO	SEQ	MO	YR
Uranium Resources, Inc.	X I - INSERT	04008786	8202	A	10	84
	M - MODIFY			B		
	D - DELETE			C		
	R - REPLACE			D		

PERIOD OF INVESTIGATION/INSPECTION						INSPECTION PERFORMED BY		ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See IEMC 0530 "Manpower Reporting—Weekly Manpower Reporting" for code)		
FROM			TO			X 1 - REGIONAL OFFICE STAFF		OTHER		
MO	DAY	YR	MO	DAY	YR	2 - RESIDENT INSPECTOR				
10	07	82	11	07	82	3 - PERFORMANCE APPRAISAL TEAM				
								REGION	DIVISION	BRANCH
								4	B	A

REGIONAL ACTION (Check one box only)		TYPE OF ACTIVITY CONDUCTED (Check one box only)				
<input type="checkbox"/> 1 - NRC FORM 581 <input checked="" type="checkbox"/> 2 - REGIONAL OFFICE LETTER		<input checked="" type="checkbox"/> 02 - SAFETY <input type="checkbox"/> 03 - INCIDENT <input type="checkbox"/> 04 - ENFORCEMENT <input type="checkbox"/> 05 - MGMT AUDIT <input type="checkbox"/> 06 - MGMT VISIT <input type="checkbox"/> 07 - SPECIAL <input type="checkbox"/> 08 - VENDOR <input type="checkbox"/> 09 - MAT ACCT. <input type="checkbox"/> 10 - PLANT SEC. <input type="checkbox"/> 11 - INVENT. VER. <input type="checkbox"/> 12 - SHIPMENT/EXPORT <input type="checkbox"/> 13 - IMPORT <input type="checkbox"/> 14 - INQUIRY <input type="checkbox"/> 15 - INVESTIGATION				

INSPECTION/INVESTIGATION FINDINGS (Check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS				ENFORCEMENT CONFERENCE HELD				REPORT CONTAIN 2,790 INFORMATION				LETTER OR REPORT TRANSMITTAL DATE					
A	B	C	D	A B C D				A B C D				A B C D				NRC FORM 581 OR REG. LETTER ISSUED		REPORT SENT TO HQ FOR ACTION			
<input checked="" type="checkbox"/> 1 - CLEAR <input type="checkbox"/> 2 - VIOLATION <input type="checkbox"/> 3 - DEVIATION <input type="checkbox"/> 4 - VIOLATION & DEVIATION				0,5				1 - YES				1 - YES				MO DAY YR		MO DAY YR			
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MODULE INFORMATION												MODULE INFORMATION																					
REC ORG	MODULE NUMBER INSP				PRIORITY	DIRECT INSP. TIME EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP				REC ORG	MODULE NUMBER INSP				PRIORITY	DIRECT INSP. TIME EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP											
TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER					LEVEL	SEQ	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	TYPE	NUMBER	PHASE					MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	SEQ	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL				
B	5	3	0	7	0	B	A	0,0	0					B	5	8	6	7	4	0	B	A	0,0	0	1,0	0							
B	5	3	0	8	0	B	A	0,0	0	1,0	0																						
B	5	7	7	7	1	B	A	0,0	7	1,0	0																						
B	5	9	2	7	0	B	A	0,0	2	1,0	0																						

* CIRCLE SEQUENCE IF VIOLATION OR DEVIATION

INSPECTOR'S REPORT
 (Continuation)
 Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		REPORT		MODULE NUMBER		IV
04008786		NO	REQ	5777101B		
		8202	A	VIOLATION SEVERITY OR DEVIATION		SITE RELATED AC BD
			B	1	2	
			C	3	4	
			D	5	6	

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

2 10 CFR 20.103 (a) (3) requires that when assessment of a particular
 3 individual's intake of radioactive material is necessary, intakes less
 4 than those which would result from inhalation for 2 hours in any
 5 one day or for 10 hours in any one week at uniform
 6 concentrations specified in Appendix B, Table I, Column 1 of
 7 10 CFR 20 need not be included in such assessment, provided
 8 that for any assessment in excess of these amounts, the entire
 9 amount is included.
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 12 intake of radon-222 daughters was not performed for periods
 13 of office occupancy on March 3, 1982, when airborne
 14 concentrations of radon daughters were measured by the licensee
 15 to be equivalent to the Appendix B limit.
 16
 17 This is a Severity Level IV violation (Supplement IV).
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DOCKET NO. (8 digits) OR LICENSE
 NO. (BY PRODUCT) (13 digits)

REPORT

MODULE NUMBER

NO

SEQ

57771101B

VI

**INSPECTOR'S REPORT
 (Continuation)
 Office of Inspection and Enforcement**

04008786

8202

VIOLATION SEVERITY OR DEVIATION

SITE RELATED

1 2 3 4 5 6

A C

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B D

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

1
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 18 1982.

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DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)

REPORT

MODULE NUMBER

NO

SEC

5777110B

VI

INSPECTOR'S REPORT
 (Continuation)
 Office of Inspection and Enforcement

04008786

8202

VIOLATION SEVERITY OR DEVIATION

SITE RELATED

1 2 3 4 5 6

AC

X

BD

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NRC FORM 786 A (11-81) 1E MC 0636 INSPECTOR'S REPORT (Continuation) Office of Inspection and Enforcement	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		REPORT NO.		MODULE NUMBER		VI VIOLATION SEVERITY OR DEVIATION 1 2 3 4 5 6 X SITE RELATED A C B D
	04008736		8202		5777110B		

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

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NRC FORM 786 A (11-81) DE MC 0636 INSPECTOR'S REPORT (Continuation) Office of Inspection and Enforcement	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		REPORT		MODULE NUMBER		VI						
	04008786		NO	SEQ	577710B								
					VIOLATION SEVERITY OR DEVIATION		SITE RELATED						
			8202	A	1	2		3	4	5	6	A	C

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