

APPENDIX A

AUG 23 1982

NOTICE OF VIOLATION

Baker Testing Services, Inc.
Hingham, Massachusetts 02043

Docket No. 30-16008
License No. 20-19067-01

As a result of the inspection conducted on July 29, 1982, and in accordance with the NRC Enforcement Policy 10 CFR 2, Appendix C, the following violations were identified:

- A. 10 CFR 34.44 requires that whenever a radiographer's assistant uses radiographic exposure devices, uses sealed sources or related source handling tools, or conducts radiation surveys required by 10 CFR 34.43(b) he be under the personal supervision of a radiographer. The personal supervision must include the radiographer's personal presence at the site where sealed sources are used and the radiographer watching the assistant's performance of the operations.

Contrary to the above, on twelve dates from September 9 to December 28, 1981, two radiographic assistants performed radiographic functions in the permanent facility without a radiographer being at the site of radiography or watching the assistant's performance of radiographic functions.

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

- B. 10 CFR 34.43(b) requires that a physical radiation survey be made after each radiographic exposure to determine that the sealed source has been returned to its shielded position. The entire circumference of the radiographic exposure device must be surveyed and, if the device has a source guide tube, the survey must include the entire length of the guide tube.

Contrary to the above, on July 29, 1982, a radiographer's assistant failed to perform a survey that was adequate to determine that the sealed source had returned to its shielded position. A survey which was intended to meet this requirement was performed, but was inadequate in that it did not include the entire circumference of the exposure device and the entire length of guide tube.

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

- C. 10 CFR 34.24 requires that each survey instrument used to conduct physical radiation surveys be calibrated at intervals not to exceed three months and after each instrument servicing.

Contrary to the above, from October 30, 1981, to March 10, 1982, physical radiation surveys were conducted with a survey instrument which was calibrated on July 30, 1982, an interval of more than three months prior to the date of use.

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

- D. 10 CFR 34.25(b) requires that each sealed source be tested for leakage at intervals not to exceed six months.

Contrary to the above, from August 26, 1981 to September 1981 and from November 15, 1981 to January 5, 1982, radiographic exposures were performed with sources that had last been leak tested on February 26, 1981, and March 15, 1981, respectively, intervals greater than six months.

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

- E. Condition 15 of license No. 20-19067-01 requires that audits of the performance of radiographers and radiographer assistants be conducted at three month intervals to assure that Commission regulations, licensee's operating and emergency procedures and the conditions of license are being adhered to.

Contrary to the above, as of July 29, 1982, audits of all radiographers and radiographer's assistants have not been conducted at three month intervals.

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

Pursuant to the provisions of 10 CFR 2.201, Baker Testing Services, Inc. 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.