

Appendix

NOTICE OF VIOLATION

Alloy Crafts Company

License No. 13-17511-01

As a result of the inspection conducted on August 23, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. License Condition No. 15 requires that all licensed material be possessed and used in accordance with statements, representations, and procedures contained in application dated April 8, 1977, and letter dated June 15, 1977, application dated September 20, 1977, and letter dated September 21, 1977. The Radiological Safety Manual that accompanies the applications state in Section No. 2.7 that periodic training will be given by the radiation safety officer as required by: new equipment purchase, changes in Federal or State regulations, new license amendments and new procedures. Part 2.7.4.1 of that section states that this will be done a minimum of four (4) times per year.

Contrary to this requirement, the NRC inspector learned through statements of licensee representatives and review of records that only one periodic training session was conducted from December 31, 1980 to the day of the inspection, August 23, 1982.

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

2. License Condition No. 15 requires that all licensed material be possessed and used in accordance with statements, representations, and procedures contained in application dated April 8, 1977, and letter dated June 15, 1977, application dated September 20, 1977, and letter dated September 21, 1977. The Radiological Safety Manual that accompanies the applications states in Section No. 1.2.7 that the radiation safety officer will make quarterly inspections of all operations to assure compliance with Federal and State regulations, conditions of the byproduct material license, operating and emergency procedures, and to advise proper management personnel of the results of this inspection. Records will be kept of these inspections showing corrective action needed and when completed.

Contrary to the above requirement, the NRC inspector learned through statements of licensee representatives and review of records, that quarterly inspections have not been performed by your radiation safety officer since September 2, 1981.

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

3. 10 CFR 34.42 requires that areas in which radiography is being performed shall be conspicuously posted as required by 10 CFR 20.203(b) and (c)(1). 10 CFR 20.203(c)(1) states that each high radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION (or DANGER) HIGH RADIATION AREA.

Contrary to this requirement, the licensee failed to properly post the high radiation area during radiography procedures performed from May 15, 1981 to August 19, 1982.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated

9/7/82

D. J. Sreniawski
D. J. Sreniawski, Chief
Materials Radiation Protection
Section 2