

APPENDIX A

NOTICE OF VIOLATION

Canspec Group, Canspec Testing, Inc.
West Oakville, Ontario, Canada L6L 6K4

Docket No. 030-32380
License No. 29-28659-01

During an NRC inspection conducted on February 17 and 28, 1994, 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, the violations are listed below:

- A. 10 CFR 34.31 requires, in part, that the licensee not permit any individual to act as a radiographer or radiographer's assistant until such individuals have demonstrated understanding of the instructions in this paragraph by successful completion of a field examination on the subjects covered.

Contrary to the above, between December 18, 1993 and February 28, 1994 for the radiographer and between October 5, 1993 and February 28, 1994 for the radiographer's assistant, the licensee permitted individuals to act as a radiographer and radiographer's assistant without completion of a field examination.

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

- B. 10 CFR 34.24 requires, in part, 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, on December 21, 1993, a licensee radiographer and/or radiographer assistant conducted physical radiation surveys with R-Metrics, Canadian Admiral survey instruments, serial numbers 1630 and/or 2130, which were last calibrated on August 11, 1993, an interval greater than three months.

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

- C. 10 CFR 34.31(c) requires that records of training of radiographers and radiographer's assistants, including records of instruction in the licensee's operating and emergency procedures, be maintained for three years.

Contrary to the above, no record of training for a radiographer's assistant's instruction in the licensee's operating and emergency procedures was maintained for an individual who had worked as a radiographer's assistant between October 5, 1993 and February 28, 1994, at the BP Oil Refinery in Marcus Hook, Pennsylvania.

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Pursuant to the provisions of 10 CFR 2.201, Canspec Group, Canspec Testing, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.