

Appendix

NOTICE OF VIOLATION

Leadership Keys, Inc.

License No. 21-19874-01

As a result of the inspection conducted on August 24, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified:

10 CFR 32.52 states each person licensed under §32.51 to initially transfer devices to generally licensed persons shall: (a) Report to the Director of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the appropriate NRC Regional Office listed in Appendix D of Part 20 of this chapter, all transfers of such devices to persons for use under the general license in §31.5 of this chapter. Such report shall identify each general licensee by name and address, an individual by name and/or position who may constitute a point of contact between the Commission and the general licensee, the type and model number of device transferred, and the quantity and type of byproduct material contained in the device. The report shall cover each calendar quarter and shall be filed within 30 days thereafter.

In addition, the licensee shall report to the responsible Agreement State agency all transfers of such devices to persons in that Agreement State.

Contrary to the above, as of the date of the inspection, the licensee did not submit the required report to the NRC or appropriate Agreement States for the second calendar quarter of 1982.

This is a Severity Level V 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 9/21/82

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