

NOTICE OF VIOLATION

Department of Commerce
Seattle, Washington

Docket No. 030-08203
License No. 46-06377-04

During an NRC inspection conducted on March 22, 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. License Condition 19 requires in part that the licensee possess and use licensed material in accordance with the statements, representations, and procedures contained in the letter dated August 16, 1991.

The letter to NRC dated August 16, 1991, states that survey meters will be calibrated once a year.

Contrary to the above, the below survey meters used for licensed activities had not been calibrated once per year:

<u>Meter</u>	<u>Year Not Calibrated</u>
T.A. Pug 1AB	1992
Ludlum 16	1991
Ludlum 14C	1991 through 1993
Universal Atomics CDV-700	1991 through 1993

This is a Severity Level IV repeat violation, second occurrence (Supplement VI). (94-01-01)

- B. License Condition 19 requires in part that the licensee possess and use licensed material in accordance with the statements, representations, and procedures contained in the letter dated March 27, 1987.

Item 10 of the letter dated March 27, 1987, states that bioassay measurements will be performed on personnel within 24 hours after working with volatile iodine-125 or iodine-131.

Contrary to the above, on March 17, 1993, licensee personnel assigned to laboratories 309 and 311 handled volatile iodine-125 and no bioassay measurement was performed on those individuals.

This is a Severity Level IV repeat violation, second occurrence (Supplement VI). (94-01-02)

- C. License Condition 19 requires in part that the licensee possess and use licensed material in accordance with the statements, representations, and procedures contained in the letter dated May 28, 1993.

Items 9-10 of the letter dated May 28, 1993, state that contamination surveys will be performed every two weeks.

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Contrary to the above, between May 28, 1993 and March 22, 1994, contamination surveys were routinely not performed every two weeks. Specifically, at least ten research laboratories did not perform contamination surveys every two weeks and these laboratories either used or stored licensed materials.

This is a Severity Level V violation (Supplement VI). (94-01-03)

- D. 10 CFR 30.51(a) requires that each licensee keep records showing the disposal of byproduct material.

Contrary to the above, as of March 22, 1994, the licensee did not keep records of the disposal of byproduct material which had been decayed in storage prior to disposal.

This is a Severity Level V violation (Supplement VI). (94-01-04)

Pursuant to the provisions of 10 CFR 2.201, Department of Commerce, Seattle, Washington, 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 V, 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. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at Walnut Creek, California
this 31st day of March 1994