

APPENDIX A  
NOTICE OF VIOLATION

Textron Defense Systems  
Wilmington, Massachusetts 01887

Docket Nos. 030-04624  
040-08806  
License Nos. 20-02729-05  
SUB-1410

As a result of the inspection conducted on August 28 and 29, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1990), the following violations were identified:

- A. Item 9. of License No. SUB-1410 requires that the use of depleted uranium (DU) components be in accordance with the procedures contained in an application dated November 24, 1981.

Paragraph 1 of Attachment D to this application requires that instruments (survey instruments) be calibrated semi-annually.

Contrary to the above, as of August 29, 1990, survey instruments were not calibrated at the required frequency. Instrument calibrations were performed during June and December 1988, June 1989, and February 1990.

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

- B. Condition 12 of License No. SUB-1410 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in an application dated March 5, 1985.

1. Paragraph 10.3 under Item 10 of this application requires that radiation and contamination surveys be conducted every 6 months.

Contrary to the above, as of August 29, 1990, radiation and contamination surveys were not conducted every 6 months. Surveys were conducted during August 1988, March and August 1989, and June 1990. The surveys conducted were not always for both radiation and contamination. For example, only 2 wipe samples were taken in the DU sand blasting areas during the June 1990 survey.

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

2. Paragraph 3. in Section 3.2.5 of Attachment 2 to this application requires that upon receipt of radioactive material, an initial radiation survey of the package be made. Further, Paragraph 1.

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in Section 3.2.6 of Attachment 2 to this application requires that all incoming shipments be monitored for conditions of packaging and evidence of contamination.

Contrary to the above, on August 29, 1990, packages received were not always surveyed or monitored.

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

3. Paragraph 10.1 under Item 10 of this application requires that all personnel in or frequenting the plating laboratory area are monitored by film badges with a 2 week exchange interval.

Contrary to the above, as of August 29, 1990, personnel in or frequenting the plating laboratory were monitored by film badges exchanged monthly.

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

- C. 10 CFR 20.401(b) requires that each licensee maintain records showing the results of surveys required by 10 CFR 20.201(b).

Contrary to the above, as of August 29, 1990, records of radiation and contamination surveys conducted in the DU plating areas were not maintained. Specifically, records were not maintained of surveys conducted during March and August 1989, and June 1990.

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

- D. Condition 15 of License No. 20-02729-05 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in an application dated August 26, 1985.

Item 15 of this application requires that the Radiation Protection Program be applied and implemented by the Radiation Protection Officer and the Isotope Committee. Item 15 also specifies the current membership of the Isotope Committee while Items 16 and 17 of this application delineate the radiation training and experience of each committee member.

Contrary to the above, as of August 29, 1990, the membership of the isotope committee had been changed and an application for an amendment to the license to incorporate these changes had not been filed.

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

Pursuant to the provisions of 10 CFR 2.201, Textron Defense Systems is hereby required to submit to this office within thirty days of the date of the letter which transmitted 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.