

APPENDIX A

NOTICE OF VIOLATION

Professional Service Industries, Inc.  
Pittsburgh, PA 15220

Docket No. 930-05985  
License No. 37-00276-25

During an NRC inspection conducted on March 8 and 10, 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 34.22 (c) requires that the licensee maintain a current copy of operating and emergency procedures. These procedures must include instructions in personnel monitoring and in the use of personnel monitoring equipment.

Contrary to the above as of March 8, 1994, the licensee has not maintained a current copy of its operating and emergency procedures. Specifically, the operating and emergency procedures did not include instruction in the use of alarm ratemeters used by radiography personnel as personnel monitoring equipment.

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

- B. 10 CFR 34.31 (c) requires that records of field examinations be maintained for three years.

Contrary to the above as of March 8, 1994, the licensee failed to record the date of a practical field examination administered to an assistant radiographer on January 12, 1993 and the date of a practical field examination administered to another assistant radiographer on October 25, 1993.

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

- C. 10 CFR 34.31 (b)(3) requires that the licensee not permit any individual to act as a radiographer's assistant until such individual has demonstrated understanding of the instructions in 10 CFR 35.31(b) by successfully completing a field examination on the subjects covered.

Contrary to the above, the licensee permitted an individual to perform the duties of an assistant radiographer without completing a practical field examination on all subject covered in 10 CFR 34.31(b). Specifically, on October 25, 1993, a trainee was administered an assistant's radiographer practical field examination that did not include the operation of the exposure device and a radiation survey meter under actual working conditions.

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

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- D. Condition 18 of NRC License No. 37-00276-25 requires that licensed material be possessed and used in accordance with statements, representation and procedures contained in an application dated March 21, 1986.

Attached to the application is the Pittsburgh Testing Laboratory Radiation Safety Procedures Manual (Manual). Part C, Section 4.2.0 of the Manual (Calibration of Survey Instruments) states that survey instruments must be capable of detecting 2 mR/hr through 1 R/hr.

Part C, Subsection 4.5.3 of the Manual (Calibration Requirements) states that a minimum of 2 points must be checked, encompassing each working range. Each point shall be separated by a minimum of 50% of the scale.

Part C, Subsection in 4.6.2 of the Manual (Calibration Source) states that the calibration source activity must provide intensities acceptable for calibration of each working range.

Contrary to the above, as of March 8, 1994, it was determined that the device used to calibrate survey meters does not provide the radiation intensities acceptable for the calibration of the "high" working range (through 1 R). Specifically, the 89 millicurie sealed cesium-137 source contained in a Gulf Nuclear Model 1C-50 calibration device produces exposure rates on the device's surface of less than 750 mR/hr, and would be considerably less at a distance sufficient to assure a point source relationship.

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

Pursuant to the provisions of 10 CFR 2.201, Professional Service Industries, 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.