

APPENDIX A

NOTICE OF VIOLATION

Department of the Army
Adelphia, MD 20783-1145

Docket No. 030-12840
License No. 19-17250-05

During an NRC inspection conducted on March 24, 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 36.23(b) requires, in part, that each entrance to a radiation room at a panoramic irradiator must have an independent backup access control to detect personnel entry while the sources are exposed. Detection of entry must activate an alarm that must also alert one other individual on-site of the entry. That individual shall be trained on how to respond to the alarm and prepared to promptly render or summon assistance.

Contrary to the above, as of March 24, 1994, the licensee did not have an alarm that alerted one other trained individual on-site when entry is detected by the independent backup access control. Specifically, a light beam/photocell receptor serves as the independent backup access control. When entry is detected, visible and audible alarms are triggered only in the entry area. If the individual is working alone, these alarms would not immediately alert one other individual on-site of the entry.

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

- B. 10 CFR 36.23(c) requires, in part, that a radiation monitor must be provided to detect the presence of high radiation levels in the radiation room of a panoramic irradiator before personnel entry. The monitor may be located in the entrance, but not in the direct radiation beam.

Contrary to the above, as of March 24, 1994, the licensee's radiation monitor, provided to detect the presence of high radiation levels in the radiation room of their panoramic irradiator before personnel entry, was located in the direct radiation beam.

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

- C. 10 CFR 36.31(b) requires that the console of a panoramic irradiator must have a source position indicator that indicates when the sources are in the fully shielded position, when they are in transit, and when the sources are exposed.

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Appendix A
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Contrary to the above, as of March 24, 1994, the licensee did not have a source position indicator on the console of their panoramic irradiator which indicated when the sources are in transit and when the sources are exposed. Specifically, the licensee uses the source elevator counterweight, visible in the control room and with position markings on the wall, to indicate when the sources are in transit and when the sources are exposed. A light on the system status panel, next to the console, indicates when the sources are stored.

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

Pursuant to the provisions of 10 CFR 2.201, Department of the Army 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.