

APPENDIX A  
NOTICE OF VIOLATION

Reliance Testing Laboratories Inc.  
Timonium, Maryland 21093

Docket No. 030-12315  
License No. 19-17176-01

As a result of the inspection conducted on October 31, 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. 10 CFR 34.11 (d)(1) requires that the Licensee establish an inspection program to include observation of the performance of each radiographer and assistant during an actual radiographic operation at intervals not to exceed three months.

License Condition No. 18 of NRC License No. 19-17176-01 requires that licensed materials be possessed and used in accordance with the statements, representations, and procedures contained in an application dated March 2, 1987. Attached to the Application is a document entitled, "Safety Procedures Radiation Safety Programs 210". Section 210.4 (Internal Inspection System) requires that the radiation safety officer inspect the performance of radiographers and assistants at intervals not to exceed three months.

Contrary to the above, as of October 31, 1990 the Radiation Safety Officer has been inspecting the performance of radiography personnel on an annual schedule instead of the required quarterly interval.

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

- B. License Condition No. 18 of NRC License No. 19-17176-01 requires that licensed materials be possessed and used in accordance with the statements, representations, and procedures contained in an application dated March 2, 1987.

Attached to the application, dated March 2, 1987, is a document entitled "Radiation Safety Training Program 210.3". Section 2.3 (Radiographic Assistant Training and Instructions) requires that an individual be given 8 hours of training prior to assuming the duties of an assistant radiographer. Also Section 3.3 (Radiographic Training and Instruction) of the same document requires that radiographic assistants be given 37 hours of training prior to assuming the duties of a radiographer.

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Contrary to the above, as of October 31, 1990, four individuals who performed the duties of radiographers have not received the 37 hours of required training and two individuals who performed the duties of assistant radiographers have not received the 8 hours of training.

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

- C. 10 CFR 34.31 (a)(4) requires that the licensee will not permit any individual to act as a radiographer until such individual has successfully completed a field examination on the subjects covered.

10 CFR 34.31(d)(3) requires that the licensee will not permit any individual to act as an assistant radiographer until such individual has successfully completed a field examination on the subjects covered.

Contrary to the above, as of October 31, 1990, two individuals were permitted to act as radiographers without having successfully completed a field examination on the subjects covered and one individual was permitted to act as assistant radiographer without having successfully completed a field examination.

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

Pursuant to the provisions of 10 CFR 2.201, Reliance Testing Laboratories, Incorporated 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.