

APPENDIX A

NOTICE OF VIOLATION

Department of the Air Force
USAF Radioisotope Committee
Brooks AFB, Texas 78235-5217

Docket No. 030-28641
License No. 42-23539-01AF

During an NRC inspection conducted on March 10, 16, 31, and April 8 and 11, 1994, five 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 34.32 requires, in part, that the licensee retain a copy of current operating and emergency procedures. These procedures must include instruction in the inspection and maintenance of radiographic exposure devices and storage containers.

Contrary to the above, as of March 10, 1994, the licensee's operating and emergency procedures did not address daily checks or quarterly inspection and maintenance of the MNRS.

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

- B. 10 CFR 34.28(a) requires that the licensee check radiographic exposure devices, storage containers, and source changers for obvious defects prior to use each day the equipment is used.

Contrary to the above, as of March 10, 1994, no routine daily checks of the MNRS had been conducted since the device began operation in October 1989.

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

- C. 10 CFR 34.28(b) requires, in part, that the licensee conduct a program of inspection and maintenance of radiographic exposure devices and source changers at intervals not to exceed three months to ensure proper functioning of components important to safety.

Contrary to the above, the licensee had not performed such inspections and maintenance on the MNRS and its source handling equipment during 1992 and 1993.

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

- D. 10 CFR 34.24 requires, in part, that each survey instrument used to conduct physical radiation surveys be calibrated at intervals not to exceed three months and after each instrument servicing.

Contrary to the above, during routine surveys on February 16, 24, and March 9, 1994, health physics technicians conducted physical radiation

surveys with a Nuclear Radiation Company, Model No. NP-2, neutron survey meter last calibrated during March 1993, an interval greater than three months.

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

- E. 10 CFR 34.25(e) requires that a sealed source which is not fastened to or contained in a radiographic exposure device to have permanently attached to it a durable tag at least (1) inch square bearing the prescribed radiation caution symbol in conventional colors, magenta or purple on a yellow background, and at least the instructions: " Danger-Radioactive Material-Do Not Handle-Notify Civil Authorities if Found."

Contrary to the above, the licensee's californium-252 sources were not fastened to or contained in the MNRS and did not have the prescribed tag.

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

Pursuant to the provisions of 10 CFR 2.201, Department of the Air Force USAF Radioisotope Committee 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 IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, 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.

Dated at Arlington, Texas
this 10th day of May, 1994