

Appendix

NOTICE OF VIOLATION

United States Steel Corporation

License No. 37-02375-17
License No. 13-07964-05

As a result of the inspection conducted on July 8, 22, and 28, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

Condition No. 17 of the 37-02375-17 license and Condition No. 16 of the 13-07964-05 license requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in certain applications and letters.

1. Application dated May 26, 1980, which is referenced in the -17 license, included a supplementary sheet entitled, "Division Radiation Officer"; Item 5 under Functions states, "Makes monthly physical inventory of sources and radiation survey of devices. Reports results to Plant Radiation Officer."

The above application also included Administrative Procedures which state, in Item 5.3.3, "Radiation surveys after the initial survey shall be made by the Division Radiation Officer." This statement is also made in Items 5.1.5 and 5.2.6 of the Administrative Procedures that were submitted with application (letter) dated April 12, 1977, which is referenced in the -05 license.

Contrary to the above, based on statements by licensee representatives and a review of radiation survey records, individuals other than Division Radiation Officers have been making routine radiation surveys of devices containing licensed material.

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

2. 10 CFR 20.203(f) requires that each container of specified amounts of licensed material bear a durable, clearly visible label identifying the radioactive contents; this label shall bear the radiation caution symbol and the words "Caution, Radioactive Material" or "Danger, Radioactive Material."

In addition, Item 4.6.1 of the Administrative Procedures that were submitted with the May 26, 1980, application referenced in the -17 license and with the April 12, 1977, application (letter) referenced in the -05 license, states that enameled steel "Radiation-Caution" signs with radiation symbol shall be located in area of gauge.

Contrary to the above, as of July 22, 1982, the symbol and information on, and in the area of, at least two gauges was not visible on labels or signs.

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

3. Application dated May 26, 1980, which is referenced in the -17 license, shows in Item 11 that radiation detection instruments will be calibrated every six months. Item 11 in application (letter) dated April 12, 1977, which is referenced in the -05 license, shows such calibrations will be done once per year.

Contrary to the above, the licensee's Eberline, Model E-530, Serial No. 977 survey meter was not calibrated from February 2, 1981 to October 12, 1981, and their Eberline, Model RO-2, Serial No. 387 survey meter was not calibrated from August 14, 1981 to May 4, 1982, intervals of more than six months. A Nuclear Chicago, Model 2673, Serial No. 2121 neutron survey meter was not calibrated from November 25, 1979 to February 20, 1982, an interval of more than one year.

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

4. Condition No. 13 of both licenses requires that sealed sources containing licensed material be tested for leakage and/or contamination at intervals not to exceed six months, except for a specific model source under the -05 license which requires testing at intervals not to exceed three years.

Contrary to the above, at least five sealed sources containing millicurie amounts of cesium-137 under the -17 license had not been tested for leakage and/or contamination from May 1979 to January 1982, another source was not tested from January 1980 to January 1982, and three other sources were not tested from June 1980 to January 1982 and from November 1978 to June 1980, intervals of more than six months.

Under the -05 license, there were at least four sealed sources containing millicurie amounts of americium-241 and at least four sealed sources containing millicurie amounts of cesium-137 that had not been tested for leakage and/or contamination at the required frequency. Periods between tests of these sources include the following: July 1980 to July 1981 to May 1982, September 1981 to April 1982, July 1980 to May 1982, January 1981 to May 1982, January 1981 to September 1981, and September 1981 to May 1982, intervals of more than six months.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

8/27/82
Date:

Original Signed by J. R. Miller

J. R. Miller, Chief
Technical Inspection Branch