

NOTICE OF VIOLATION

X-R-I Testing, Inc.
Holland, Michigan

License No. 21-05472-01
Docket No. 030-04837

As a result of the inspection conducted on January 17, 1991, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1990)(Enforcement Policy) the following violations were identified:

1. 10 CFR 20.409(b) states that when a licensee is required pursuant to 10 CFR 20.405 or 20.408 to report to the Commission any exposure of an individual to radiation or radioactive material, the licensee shall also notify the individual. Such notice shall be transmitted at a time no later than the transmittal to the Commission, and shall comply with the provisions of 10 CFR 19.13(a) of this chapter.

10 CFR 20.408(b) requires, in part, that an exposure report be furnished to the Commission within 30 days after the exposure of the individual has been determined by the licensee or 90 days after the date of termination of employment, whichever is earlier.

Contrary to the above, the licensee failed to furnish within 90 days an exposure report to the Commission and a former employee notifying them of the individual's exposure to radiation or radioactive material. Specifically, a radiographer terminated employment on August 10, 1990, and a termination exposure report was not furnished to the Commission and the individual until January 17, 1991, a period greater than 90 days.

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

2. 10 CFR 34.11(d)(1) requires, in part, that an applicant have an inspection program that requires the observation of the performance of each radiographer and radiographer's assistant during an actual radiographic operation at intervals not to exceed three months.

Condition 19 incorporates the inspection program containing the requirements stated in 10 CFR 34.11(d)(1) as submitted in the licensee's application dated April 29, 1987, into License No. 21-05472-01. Item 7(C)(1) of the aforementioned application requires the licensee to make unannounced audits of operating personnel at areas of radiographic operations at least quarterly.

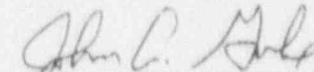
Contrary to the above, since January 1988, the licensee on approximately 15 occasions failed to make unannounced audits of operating personnel at areas of radiographic operations on a quarterly basis as required.

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

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

FEB 19 1991

Dated _____



John A. Grobe, Chief
Nuclear Materials Safety Branch