

APPENDIX A

NOTICE OF VIOLATION

High Steel Structures, Inc.
Lancaster, Pennsylvania 17505-0008

Docket No. 030-12926
License No. 37-17534-01

During an NRC inspection conducted on April 21 and 22, 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 34.33(c) requires that pocket dosimeters be checked at intervals not to exceed one year for correct response to radiation.

Contrary to the above, a pocket dosimeter (Serial No. C033104) worn by an employee who performed radiographic operations on April 21, 1994, had not been checked for correct response to radiation since April 12, 1993.

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

- B. 10 CFR 34.42 requires that areas in which radiography is being performed will be conspicuously posted as required by 10 CFR 20.1902(b).

10 CFR 20.1902(b) requires that each high radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbols and the words: "Caution, High Radiation Area or Danger, High Radiation Area".

Contrary to the above, on April 21, 1994, an area in which radiography was being performed was not conspicuously posted as required by 10 CFR 20.1902(b). Specifically, the radiographer placed a "Caution, High Radiation Area" sign on each side of an exposure device stand. However, prior to the commencement of actual radiography operations, he placed a lead plate (shielding material) against each side of the stand; thus, completely obscuring the two signs from view.

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

Pursuant to the provisions of 10 CFR 2.201, High Steel Structures, Inc. 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

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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.