

Appendix

NOTICE OF VIOLATION

30-10856

Calumet Testing Services, Inc.

License No. 13-16347-01

As a result of the inspection conducted on February 25, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. License Condition No. 16 requires that all licensed material be possessed and used in accordance with statements, representations, and procedures contained in application dated April 1, 1982.

The application dated April 1, 1982, states that once every 3 months each radiographer and radiographer's assistant will be observed to determine if he is performing his duties in a safe manner. A record of this audit will be filed for review.

Contrary to this requirement, audits of radiographers were not performed once every 3 months. Specifically, two radiographers were audited only once in 1982, One radiographer was audited on April 26, 1982, May 25, 1982, and November 26, 1982.

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

2. 10 CFR 34.31, states that the licensee shall not permit any individual to act as a radiographer until the individual has been instructed in the subjects outlined in Appendix A of Part 34. Appendix A, item V, "Case Histories of Radiography Accident", is one of the required subjects.

Contrary to this requirement, it was learned from statements of licensee representatives and a review of records that your training program did not include item V in Appendix A, "Case Histories of Radiography Accidents". Specifically, item V, "Case Histories of Radiography Accidents" were not included in the training program for two individuals who became radiographers in September 1981.

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

3. 10 CFR 34.29(c), states that the alarm system shall be tested at intervals not to exceed three months or prior to the first use thereafter of the source in the installation.

Contrary to this requirement, you failed to test the alarm system every three months.

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

4. License Condition No. 15 states that licensed material may be transported or delivered in accordance with 10 CFR 71.5, "Transportation of Licensed Material." 10 CFR 71.5 states that no licensee shall transport any licensed material out of his facility unless the licensee complies with 49 CFR Parts 170-189.
- a. 49 CFR 177.817(a) states that a carrier may not transport a hazardous material unless it is accompanied by a shipping paper that is prepared in accordance with Part 49.

Contrary to this requirement, you failed to prepare shipping papers to accompany hazardous material. Specifically, before February 23, 1982, shipping papers did not accompany radiography cameras (containing iridium-192 seal sources) which were shipped to area job sites.

- b. 49 CFR 172.203(d)(i) states that the shipping paper must include the name of each radionuclide.

Contrary to this requirement, the shipping papers did not always include the name of each radionuclide. Specifically, on February 2, 5, and 22, 1983, the cobalt-60 camera was shipped to an area job site, and the shipping papers did not indicate cobalt-60 as the radionuclide. The shipping papers indicated iridium-192 rather than cobalt-60 as the radionuclide.

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

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.

March 16, 1983
Dated

D. J. Sceniawski
D. J. Sceniawski, Chief
Materials Radiation Protection
Section 2