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APPENDIX A

NOTICE OF VIOLATION

Hamilton Watch Company, Inc.  
Lancaster, Pennsylvania 17604

Docket No. 030-12704  
License No. 37-03572-06

As a result of the inspection conducted on December 8, 1983, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 19.12 requires that all individuals working in or frequenting any portion of a restricted area be kept informed of the storage, transfer, or use of radioactive materials or of radiation in such portions of the restricted area; be instructed in the health protection problems associated with exposure to such radioactive materials or radiation, in precautions of procedures to minimize exposure, and in the purposes and functions of protective devices employed; and be instructed in, and instructed to observe, to the extent within the worker's control, the applicable provisions of Commission regulations and licenses for the protection of personnel from exposure to radiation or radioactive materials occurring in such area.

Contrary to the above, as of December 8, 1983, workers in the restricted area and several supervisors of these workers had not been instructed in any of the above and were unfamiliar with the conditions of the license.

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

- B. Condition 15 of License No. 37-03572-06 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated November 8, 1982 and October 31, 1977.

1. Item No. 11 of the application dated November 8, 1982, requires that the Overhoff & Associates Betatec Model 210 tritium air monitor be calibrated once each month, after the alarm has been used, and after any period when the instrument is out of service. Item No. 11 also requires that the strip chart recorder attached to the tritium monitor be operable and that records of the strip chart recorder be maintained.

Contrary to the above, as of December 8, 1983, the tritium air monitor in the tritium room had not been calibrated since November of 1979, a period more than one month and the strip chart recorder was inoperable and no records of strip chart recorder records had been maintained.

This is a Severity Level IV violation (Supplement VI)

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2. The response to Question 2 on page 5 of the application (letter) dated October 31, 1977 requires that the Betatec Model 210 tritium air monitor be tested daily for proper operation prior to employees entering the tritium room and that records of these checks be maintained.

Contrary to the above, as of December 8, 1983, daily testing of the tritium air monitor had not been conducted and no records of daily checks had been maintained.

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

3. The response to Question 3 on page 3 of the application (letter) dated October 31, 1977, requires tritium bioassays from all workers in the controlled tritium area on a monthly basis for the first three months and quarterly thereafter.

Contrary to the above, as of December 8, 1983, no bioassays had been performed for at least one technician who has routinely worked in the tritium area for approximately one year.

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

- C. 10 CFR 19.11(a) and (b) require that current copies of Part 19 and Part 20, the license, license conditions, documents incorporated into the license, license amendments, and operating procedures be posted, or that a notice describing these documents and where they may be examined, be posted. 10 CFR 19.11(c) requires that a current copy of Form NRC-3, "Notice to Employees", be posted.

Contrary to the above, as of December 8, 1983, current copies of Parts 19 and 20 and Form NRC-3 were not posted, the license, license amendments and operating procedures were not posted nor was a notice posted which described these documents or where they could be examined.

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

Pursuant to the provisions of 10 CFR 2.201, Hamilton Watch Company, Inc. is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.