

APPENDIX A

NOTICE OF VIOLATION

ICI Explosives
Valley Forge, PA 19482

Docket No. 030-33499
License No. 37-07349-03

During an NRC inspection conducted on November 11, 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:

License Condition No. 13 of NRC License No. 37-07349-03 requires that the licensee conduct its program in accordance with the statements, representations, and procedures contained in a letter dated March 9, 1994.

- A. Item 10 of the March 9, 1994 letter, Section 2.0, states that the ratemeter (Tracer-Flo) Model 480530 will be calibrated by RMC every six (6) months.

Contrary to the above, as of November 11, 1994, the Ratemeter had not been calibrated by RMC. Specifically, the instrument is being calibrated every (6) months by the licensee's Electronics Department.

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

- B. Item 10 of the procedures contained with the March 9, 1994 letter, Section 10.2, states that the G-M Survey Meter will be checked prior to each use with a check source.

Contrary to the above, as of November 11, 1994, authorized users do not check the Ludlum Model 3 Survey Meter (with a radioactive test source) prior to each use but do the check during use. Specifically, the 5 microcurie radium-226 check source used to test the meter is stored inside a steel cabinet which is located inside the room which contains the Tracer-Flo Model 400010 Krypton-85 system. An individual entering the room must make radiation measurements immediately, and rely on measurements made with the meter prior to checking its operability to determine if it is safe to enter.

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

Pursuant to the provisions of 10 CFR 2.201, ICI Explosives 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 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.