

NOTICE OF VIOLATION

City of Ann Arbor  
Ann Arbor, Michigan

License No. 21-24955-01  
Docket No. 030-29961

As a result of the inspection conducted on May 21, 1991, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1991) (Enforcement Policy) the following violations were identified:

1. License Condition No. 11. states that the Radiation Protection Officer for licensed activities is Earl W. Shepard, Sr.

Contrary to the above from January 1991 to May 21, 1991, an individual other than Earl W. Shepard, Sr. served as the Radiation Protection Officer.

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

2. License Condition No. 12. A. (1) requires the licensee to leak test sealed sources at intervals not to exceed six months.

Contrary to the above from August 1987 to May 21, 1991, the licensee failed to leak test their Troxler gauge containing sealed sources.

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

3. 10 CFR 71.5(a) requires that each licensee who transports licensed material outside of the confines of its plant or other place of use, or delivers licensed material to a carrier for transport comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 170-189.

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 172.200, 172.201, 172.203 of this subchapter.

Contrary to the above from August 1987 to May 21, 1991, the licensee has transported radioactive material without shipping papers accompanying the shipments.

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

4. License Condition No. 16 requires the licensee to conduct its program in accordance with its statements and representations contained in certain referenced letters and applications.

Item 10.I.A.3. of the referenced application dated April 16, 1987, requires that all individuals operating the Troxler gauge wear personnel monitoring equipment.

Contrary to the above from August 1987 to May 21, 1991, individuals operating the Troxler gauge were not wearing personnel monitoring equipment.

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

5. License Condition No. 14 requires a physical inventory to be conducted every six months to account for all sources and/or devices received or possessed under the license.

Contrary to the above from August 1987 to May 21, 1991, the licensee failed to conduct a physical inventory every six months to account for all sources and/or devices received or possessed under the license.

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

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 violation: (1) the corrective steps that have been taken and the results achieved; (2) the corrective steps that have been 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.

JUN 07 1991

Dated \_\_\_\_\_

*William Snell*  
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William Snell, Chief  
Nuclear Materials Safety  
Section 2