

APPENDIX A

NOTICE OF VIOLATION

Manlabs, Inc.
Cambridge, Massachusetts 02139

Docket No. 040-08833
License No. SUB-1427

As a result of the inspection conducted on September 13, 1991, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1990), the following violations were identified:

Condition 12 of License No. SUB-1427 requires that licensed material be possessed and used in accordance with the statements, representations and procedures contained in an application dated April 21, 1983, and a letter dated June 6, 1983.

- A. Item No. 3 of the letter dated June 6, 1983, requires that the employee's work area will be monitored with a Geiger Counter at the end of each day.

Contrary to the above, as of September 13, 1991, monitoring of the employee's work area was not done at the end of each day.

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

- B. Item No. 3 of the letter dated June 6, 1983 requires that wipe test surveys be performed biweekly.

Contrary to the above, as of September 13, 1991, the last wipe tests were performed in June, 1990.

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

- C. Item 11, Section (6) of the application dated April 21, 1983 requires that Geiger counters be calibrated at intervals not exceeding six (6) months.

Contrary to the above, as of September 13, 1991, the Geiger Counter had not been calibrated since March 8, 1990.

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

- D. Item No. 3 of the letter dated June 6, 1983, requires that urinalysis for uranium be performed quarterly.

Contrary to the above, as of September 13, 1991, urinalysis was conducted on an annual basis.

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

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REGION I

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Pursuant to the provisions of 10 CFR 2.201, Manlabs, 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.