

APPENDIX
NOTICE OF VIOLATION

Radiography Inspection Inc.

Docket: 30-20782
License: 15-21451-01

Based on the results of the inspection conducted on January 29, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583 (March 8, 1984), the following violations were identified:

1. 10 CFR 34.11(d) requires, in part, that the licensee perform internal inspections on radiographers and radiographer assistants at intervals not to exceed 3 months.

Contrary to this requirement, the licensee had not performed internal inspections on any radiographer or assistant radiographer during the 4 1/2 month period from September 13, 1984, to January 29, 1985.

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

2. 10 CFR 34.31(c) requires, in part, that records of training and examination for radiographers and radiographer assistants shall be maintained for 3 years.

Contrary to this requirement, on the date of the inspection, the licensee had not maintained the test records for four radiographers who were administered written qualifying examinations.

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

3. 10 CFR 20.102(a) requires, in part, that each licensee shall require an individual, prior to first entry into the licensee's restricted area under such circumstances that the individual will receive or is likely to receive in any period of one calendar quarter an occupational dose in excess of 25 percent of the applicable standards specified in 20.101(a), to disclose in a written, signed statement, the nature and amount of any occupational dose which the individual may have received during that specifically identified calendar quarter from sources of radiation possessed or controlled by other persons.

Contrary to this requirement, on the date of the inspection, the licensee had incomplete records of previous occupational exposures for six radiographers.

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

8502200091 850215
REG4 LIC30
15-21451-01 PDR

4. 10 CFR 20.408 and 20.409 require, in part, that when an individual terminates employment with a licensee, the licensee shall furnish to the Nuclear Regulatory Commission and to the individual, a report of the individual's exposures to radiation incurred during their period of employment. Such reports shall be furnished within 30 days after the exposure has been determined by the licensee or 90 days after the date of termination, whichever is earlier.

Contrary to this requirement, the licensee had not furnished exposure reports to the Commission or to four individuals whose work had been terminated at least 90 days prior to the date of the inspection.

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

5. 10 CFR 71.72 requires, in part, that a general license for shipment in Department of Transportation (DOT) specification containers is issued provided the licensee has a quality assurance program, whose description has been submitted to and approved by the Commission as satisfying the provisions of 71.5; provided the licensee has a copy of the certificate of compliance; and provided the shipper register in writing with the NRC as a user of the specific DOT specification container.

Contrary to this requirement, as of January 29, 1985, the licensee had not established an approved quality assurance program, did not not have copies of the certificates of compliance, and had not registered with the NRC as a user of the DOT specification containers in its possession used to transport greater than 20 Ci quantities of iridium-192 in special form.

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

6. 10 CFR 71.5(a) requires, in part, that no licensee shall transport any licensed material outside the confines of his plant or other place of use, or deliver any licensed material to a carrier for transport, unless the licensee complies with applicable requirements of the regulations appropriate to the mode of transport of the DOT in 49 CFR Parts 170-189.

49 CFR 173.476(a) requires, in part, that each shipper of special form radioactive material shall maintain on file for at least 1 year after the last shipment, a complete certification and supporting safety analysis demonstrating that the special form materials meet the requirements of 49 CFR 173.469.

Contrary to this requirement, on the date of the inspection a file had not been maintained of the certifications for special form sources possessed by the licensee.

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

Pursuant to the provisions of 10 CFR 2.201, Radiography Inspection Inc. is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including:

- (1) the corrective steps which have been taken and the results achieved;
- (2) the corrective steps which will be 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.

Dated FEB 15 1985