

ENCLOSURE

NOTICE OF VIOLATION

Roy N. Ford Company, Inc.  
Blairs, VA

Docket No. 030-30076  
License No. 45-24927-01

During the Nuclear Regulatory Commission (NRC) inspection conducted on August 31, 1988, 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 (1988), the violations are listed below:

- A. License Condition 11 requires that licensed material shall be used by, or under the supervision and in the physical presence of, individuals who have completed the manufacturer's training, have been instructed in the licensee's operating and emergency procedures and are approved by the Radiation Protection Officer, Fred C. Ford. Copies of the certificate of training for each user shall be maintained by the licensee.

Contrary to the above, an employee of the licensee who has not completed the manufacturer's training course has used licensed material independently for approximately thirty days and as recently as August 31, 1988.

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

- B. License Condition 15 requires that except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.

1. Application dated June 10, 1987
2. Letter dated July 22, 1987

Item 10(b)(3) of the application dated June 10, 1987 requires that personnel when operating licensed material shall wear a personnel monitoring device assigned to that individual.

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Contrary to the above, on August 31, 1988, an employee of the licensee operated a Troxler gauge containing licensed material without wearing the required personnel monitoring device. In addition, no monitoring device was specifically assigned to this employee.

This is a Severity Level IV violation (Supplement VI)

- C. 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 shall comply with the applicable requirements of the regulations, appropriate to the mode of transport, of the Department of Transportation in 49 CFR Parts 170-189.

49 CFR 172.200(a) requires that each person who offers a hazardous material for transportation shall describe the hazardous material on a shipping paper.

Contrary to the above, the licensee has transported licensed hazardous material outside the confines of its office since April 1988, without shipping papers.

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

- D. 10 CFR 19.11 requires a licensee to post current copies of certain documents near or in a licensed activity location. These documents include 10 CFR 19, 10 CFR 20, the license complete with amendments, referenced documents, and operating procedures. If posting is not practicable, the licensee may post a notice that describes the documents and where they may be examined. The licensee is also required to post Form NRC-3, "Notice to Employees," to permit individuals who frequent any portion of a "restricted area" to observe the form.

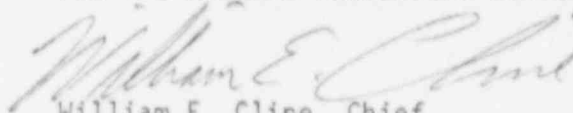
Contrary to the above, on August 31, 1988, the licensee had posted the license only. No other documents, no NRC-3 "Notice to Employees" nor a notice that describes the documents and where they may be examined was posted.

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

Pursuant to the provisions of 10 CFR 2.201, Roy N. Ford Company, Inc., is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the

results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order 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.

FOR THE NUCLEAR REGULATORY COMMISSION



William E. Cline, Chief  
Nuclear Materials Safety and  
Safeguards Branch  
Division of Radiation Safety  
and Safeguards

Dated at Atlanta, Georgia  
this 20<sup>th</sup> day of September 1988