

## NOTICE OF VIOLATION

LifeChem Incorporated  
Rockleigh, NJ

Docket No. 030-15009  
License No. 29-18399-01

During an NRC inspection conducted on November 5 and 9, 1998, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy), NUREG-1600, the violation is listed below:

Condition 15 of License No. 29-18399-01 requires that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the documents listed including any enclosures.

Section V., *Radiation Safety*, of the LIFECHEM LABORATORIES HEALTH AND SAFETY MANUAL enclosed with the letter dated February 6, 1991, includes the survey procedure for *Removable Radioactive Contamination Survey Procedure (Wipe-Testing)*. The Frequency of Surveys in this procedure requires that **all areas** where radioactive material is stored or used will be surveyed on a monthly basis, at the end of the work day.

Contrary to the above, as of November 5, 1998, removable radioactive contamination surveys have not been conducted in all areas where radioactive material is stored or used. Specifically, surveys have not been performed in the walk-in cold-room storage vault nor the low level radioactive waste (LLRW) storage areas since the licensee relocated to its current facility in 1995.

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

Pursuant to the provisions of 10 CFR 2.201, LifeChem Incorporated 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to 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.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.