

ENCLOSURE 1

NOTICE OF VIOLATION

University of Virginia  
Charlottesville, Virginia

Docket No. 50-62  
License No. R-66

During the Nuclear Regulatory Commission (NRC) inspection conducted on May 27-29, 1986, violations of NRC requirements were identified. The violations involved failure to maintain radiation control procedures, failure to adequately evaluate radiation hazards that may be present, failure to perform radiological surveys on a radioactive materials shipment and failure to prescribe activities affecting quality in written procedures for radioactive materials transport. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

- A. Technical Specification 6.3 states that radiation control procedures shall be maintained.

Standard Operating Procedure 10.4.B.4, Revision 2/83, requires that all noncontrolled areas, including but not limited to representative offices and classrooms, shall be surveyed by the Reactor Health Physicist or his designee on a monthly basis.

Standard Operating Procedure 10.11.B defines noncontrolled areas as areas of the building where radioactive materials are not used or areas where surveys show minimal loose surface contamination.

Contrary to the above, the requirement to perform surveys in noncontrolled areas of the reactor facility was not met in that during 1985, representative offices and classrooms were not surveyed.

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

- B. 10 CFR 20.201(b) requires that each licensee make or cause to be made such surveys as may be necessary for the licensee to comply with the regulations and are reasonable under the circumstances to evaluate the extent of the radiation hazards that may be present. 10 CFR 20.201(a) defines survey as an evaluation of the radiation hazards incident to the production, use, release, disposal or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, an evaluation of the radiation hazard that may have been present was not adequate in that on February 11, 1985, and May 23, 1985, dose rates of 20,000 and 19,300 millirem per hour, respectively, were measured on gold-198 activated seeds using an instrument that was not calibrated for measurements on the 20 Roentgen per hour scale.

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

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

49 CFR 173.475(i) requires that, before each shipment of any radioactive materials package, the shipper shall ensure by examination or appropriate tests that external radiation and contamination levels are within allowable limits.

Contrary to the above, assurance that external radiation and contamination levels were within allowable limits was not obtained in that on August 20, 1985, a radioactive materials shipment of pond water to an offsite contractor was made and no radiation or contamination surveys were performed.

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

- D. 10 CFR 71.0(d) states that the transport of licensed material or delivery of licensed material to a carrier for transport is subject to the quality assurance requirements of 10 CFR 71, Subpart H.

10 CFR 71.111. Subpart H states that the licensee shall prescribe activities affecting quality by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall require that these instructions, procedures or drawings include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, instructions, procedures or drawings for activities affecting quality were not prescribed in that radioactive materials shipments for 1985 and 1986, were performed without procedures which prescribed activities affecting quality in the transportation of licensed material.

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

Pursuant to the provisions of 10 CFR 2.201, the University of Virginia is hereby required to submit to this Office within 30 days of the date of the letter transmitting this Notice a written statement or explanation in reply including 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

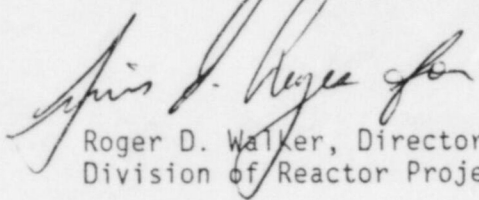
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the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in dark ink, appearing to read "Roger D. Walker", is written over the typed name and title.

Roger D. Walker, Director  
Division of Reactor Projects

Dated at Atlanta, Georgia  
this 30 day of July 1986