

APPENDIX A

NOTICE OF VIOLATION

Berthold Systems, Inc.
Sewickley, Pennsylvania 15143

Docket No. 030-20043
License No. 37-21226-01

As a result of the inspection conducted on August 20, 1986, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. Condition 17 of License Number 37-21226-01 requires that the licensee conduct its program in accordance with the statements, representations, and procedures contained in various documents including letter dated February 25, 1985.

1. Section II of letter dated February 25, 1985, includes "Procedures for Replacing Sources at the Customer's Facility." This gives the instructions for the removal and replacement of Berthold device sources to be followed by Berthold representatives.

Contrary to the above, as of August 20, 1986, the procedure for removal and replacement of sources was not being followed as specified in the above mentioned document. Specifically, remote handling devices were not being used.

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

2. Section II of letter dated February 25, 1985, includes "Procedures for Shipping Devices". This gives the instruction to be followed by Berthold personnel when shipping devices containing radioactive material. Section E of the instruction requires that radiation levels be checked at the surface of a device or package. It also requires that the readings obtained be recorded.

Contrary to the above, on May 13, 1986, a survey was performed on a package containing a device with a millicurie quantity of radioactive material as a sealed source, but the readings obtained were not recorded.

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

3. Section II of letter dated February 25, 1985, includes "Procedures for Receiving Shipments of Nuclear Devices from Germany or Returns from Customer". This requires that all nuclear devices received be surveyed in accordance with the procedures specified in this section within three (3) hours if received during normal working hours or within eighteen (18) hours if received after working hours.

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Contrary to the above, as of August 20, 1986, several shipments containing radioactive materials were surveyed in accordance with the above procedures, and records of surveys were not maintained.

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

Pursuant to the provisions of 10 CFR 2.201, Berthold Systems, Incorporated 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.