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J. W. Hock

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37-02567-03

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Jones and Laughlin Steel Corporation
Aliquippa Works Division
Aliquippa, Pennsylvania 15001

Attention: Mr. Harry P. Saxer, Works Manager
Aliquippa Division

Gentlemen:

This refers to the inspection conducted on January 29, 1970, of your activities authorized under AEC Byproduct Material License No. 37-02567-03, with respect to the extremity exposures received in December 1969, by several of your employees during the removal and attempted repair of two malfunctioning measuring devices, each containing approximately 30 millicuries of cobalt 60.

As a result of the inspection, it appears that certain of your activities were not conducted in full compliance with conditions of your license and the requirements of the AEC's "Standards for Protection Against Radiation," Part 20, Title 10, Code of Federal Regulations, in that:

1. Contrary to License Condition No. 15, licensee personnel other than J. W. Hock performed maintenance and repair on two source holder units, each containing approximately 30 millicuries of cobalt 60, during December 16-18, 1969.
2. Contrary to 10 CFR 20.201(b), "Surveys,"
 - a.) radiation surveys were inadequate to evaluate the radiation hazards associated with the opening and attempted repair during December 16-18, 1969, of the source holder units discussed in Item 1 above; and,
 - b.) radiation surveys were inadequate to evaluate the radiation hazards associated with routine operation and maintenance activities at the Continuous Casting line where the source holder units are installed in the Mold Level Gauges.

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- 3. Contrary to 10 CFR 20.105(b)(1) and (b)(2), "Permissible levels of radiation in unrestricted areas:"
 - a.) radiation levels in excess of 5 milliroentgens per hour existed in an unrestricted area in the Electrical Equipment Room during December 16-18, 1969, where the sources discussed in Items 1 and 2(a) above were located; and,
 - b.) radiation levels of approximately 20 milliroentgens per hour were noted in an unrestricted area at the Continuous Casting Line where maintenance work was being performed.
- 4. The Electrical Equipment Room and the Continuous Casting Line areas, discussed in Item 3 above, were not posted as required by 10 CFR 20.203(b), "Caution signs, labels and signals."

This notice is sent to you pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you, 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.

Based on our review of the inspection results, we believe that improvements are needed in the management of the company's licensed program. In your reply to this letter, please inform us of the steps taken by you to coordinate the administration of your program so as to assure that adequate control over all aspects of the company's licensed operations will be maintained.

Very truly yours,

bcc: Mr. Tom M. Gerusky, Dir.
 Off. of Radiological Health
 Penn. Dept. of Health
 P.O. Box 90
 Harrisburg, Pa. 17120

Lawrence D. Low, Director
 Division of Compliance

cc: Mr. Andrew A. Mammarelli, Jr.
 Corporate RSO

bcc: PDR
 NSIC
 DR Central File
 DML:IB
 CO:I

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