

APPENDIX A

NOTICE OF VIOLATION

As a result of the inspection conducted from October 26 through 28, 1992, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1992), the following violations were identified:

Condition 23 of License No. 29-00139-02 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated February 28, 1989 and a letter dated May 24, 1990.

1. Item 17, Number 9 of the letter dated May 24, 1990, requires that work areas be surveyed by the workers for radiation and contamination before commencing, during the processing and after the completion of the assignment. It further requires that all radioactive contaminated areas must be cleaned and rechecked.

Contrary to the above, as of October 27, 1992, work areas where radioactive materials are used were not adequately surveyed for contamination. Specifically, tritium was routinely used in Room F1.4812 at Lawrenceville and the room was not surveyed for contamination before, during or after use of licensed material.

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

2. Item 10.3, Number 8 of the application dated February 28, 1989 requires, in part, that all thyroid assay records be evaluated and kept by the Health Physics Office.

Contrary to the above, on October 27, 1992, thyroid assay records were not kept by the Health Physics Office for evaluation. Specifically, an authorized user who routinely performs iodinations kept his thyroid assay record in his office and, consequently, the Health Physics Office failed to evaluate these thyroid assay records.

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

Pursuant to the provisions of 10 CFR 2.201, E.R. Squibb and Sons, Inc. 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.