

NOV 27 1992

Docket No. 030-29462  
License No. 45-23645-01NA  
Permit No. 46-00253-A1NP

Department of the Navy  
ATTN: RADM J. Walker, USN  
Chairman  
Navy Radiation Safety Committee  
Chief of Naval Operations (N45)  
Washington, D.C. 20350-2000

Gentlemen:

SUBJECT: NOTICE OF VIOLATION  
(NRC INSPECTION REPORT NO. 45-23645-01NA/92-03)

This refers to the Nuclear Regulatory Commission (NRC) inspection conducted by Mr. D. Skov on August 13-14, 1992, at the Naval Undersea Warfare Center, Keyport, Washington. The inspection included a review of activities authorized by Navy Radioactive Materials Permit No 46-00253-A1NP at the Naval Undersea Warfare Center facility. At the conclusion of the inspection, the findings were discussed with Richard Yale, the facility Radiation Safety Officer (RSO) and with CAPT James Malinoski of the Navy Radiation Safety Committee (NRSC). The inspection findings were also summarized during a telephone conversation between CAPT Malinoski and Mr. J. Pelchat of this office on August 24, 1992.

The inspection was an examination of activities conducted under your license with respect to radiation safety and compliance with NRC regulations and the conditions of your license. It included selective examinations of procedures and representative records, interviews with personnel and direct observations by the inspector.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice).

In addition to the apparent violations, the NRC is concerned that the facility RSO implemented revisions to the activity's radiation safety procedures without prior NRSC approval. Some of these revisions included: (1) deletion of the action levels specifying maximum permissible radiation levels when personnel enter a radiographic cell; (2) deletion of the requirement to record the results of radiation surveys in the utilization log; and, (3) deletion of the emergency procedures to be followed by radiographic personnel in the event a source in radiography cell failed to return to the shielded position. These revisions have significant potential to reduce the level of protection the

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procedures are intended to provide. In your response to this letter, describe the actions the Navy has taken and plans to take to improve permittees' understanding of radiation safety procedure revision requirements.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,



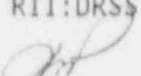
J. Philip Stohr, Director  
Division of Radiation Safety  
and Safeguards

Enclosure:  
Notice of Violation


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D. Skov, RV

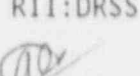
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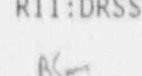
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