

## Appendix

### NOTICE OF VIOLATION

Bucher, Willis & Ratliff

License No. 24-18683-01

As a result of the inspection conducted on October 1, 1985, and in accordance with the General Policy and Procedures for NRC Enforcement Actions (10 CFR Part 2, Appendix C), the following violations were identified:

1. 10 CFR 20.101(A) limits the whole body occupational exposure of an individual in a restricted area to 1.25 rems per calendar quarter, except as provided by 10 CFR 20.101(b). Paragraph (b) allows a whole body exposure of 3.0 rems per calendar quarter provided certain specified conditions are met prior to the exposure.

Contrary to this requirement, an individual working with licensed materials received a whole body occupational radiation dose which exceeded 1.25 rems during a calendar quarter, and the conditions of paragraph (b) were not met. Specifically, an individual who periodically used your moisture/density gauges received a whole body dose of 1.55 rems for the second calendar quarter of 1980.

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

2. 10 CFR 20.201(b) requires that you make such surveys as (1) may be necessary for you to comply with the regulations in this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. As defined in 10 CFR 20.201(A), "survey" means 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, as of the date of this inspection, October 1, 1985, you failed to perform such surveys (evaluations) as were necessary to assure compliance with 10 CFR 20.101, "Radiation Dose Standards for Individuals in Restricted Areas." Specifically, until directed to do so during this inspection, you failed to evaluate the validity and/or significance of the radiation exposure described in Item 1 above.

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

3. 10 CFR 20.405(A) requires that, within 30 days, you make a written report to the Commission concerning each exposure to radiation in excess of the applicable limit in 10 CFR 20.101. 10 CFR 19.13(d) requires that you make a written report of such exposure to the individual exposed.

Contrary to these requirements, as of the date of the inspection, October 1, 1985, you failed to report to the Commission, and to the individual exposed, the exposure described in Item 1.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

OCT 24 1985

Dated \_\_\_\_\_

*J.R. Lasuk*  
for D. J. Sreniawski, Chief  
Nuclear Materials Safety Section 2