

APPENDIX A

NOTICE OF VIOLATION

Koppers Company, Incorporated
Monroeville, Pennsylvania

Docket Nos. 30-06244
30-06101
30-06100
30-18965
30-20031
30-13619
30-17529

License Nos. 37-10845-01
37-03400-03
37-03400-02
37-03138-06
37-03138-07
37-17897-01
37-19376-01

As a result of the inspection conducted on February 12 and 15, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 20.301 requires that no licensee dispose of licensed material except by certain specified procedures.

Contrary to the above, prior to July 1984, a detector cell containing licensed material was disposed of to the normal trash, a method not authorized by 10 CFR 20.301.

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

- B. Condition 13 of License Nos. 37-10845-01 and 37-17897-01 and Condition 14 of License Nos. 37-03138-06 and 37-19376-01 require that sealed sources containing byproduct material be tested for leakage and/or contamination at intervals dependent upon the specific source involved, but not to exceed either six months or three years.

Contrary to the above, as of February 15, 1985, two sealed sources containing 15 millicuries of nickel-63, which are required to be tested for contamination or leakage at six month intervals, had been tested only in June of 1984 since 1982. Also contrary to the above, sealed sources containing from 10 to 300 millicuries of cesium-137, which are required to be tested at six month or three year intervals, had not been tested for contamination or leakage at the required interval on at least five occasions since 1982.

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

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- C. Condition 15 of License Nos. 37-10845-01, 37-17897-01, and 37-03138-06 and Condition 16 of License No. 37-19376-01 require that a physical inventory be conducted every six months to account for all sealed sources possessed under the license and that records of the inventories be maintained.

Contrary to the above, as of February 15, 1985, the required inventories were not conducted during 1982, 1983 and 1984.

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

- D. Condition 16 of License No. 37-10845-01 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated June 28, 1984, and a letter dated October 9, 1984.

Item 11.A of this application requires that survey meters be calibrated semi-annually. A previous application dated March 27, 1979 and referenced in the license contained the same requirement.

Contrary to the above, as of February 15, 1985, survey meters were calibrated in August 1981, May 1983 and on July 17, 1984, periods in excess of six months.

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

Pursuant to the provisions of 10 CFR 2.201, Koppers Company, 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.