

NOTICE OF VIOLATION

Arctic Slope Inspection Services, Inc.
Anchorage, Alaska

Docket No. 030-31760
License No. 50-29015-01
EA 96-449

During an NRC inspection completed October 22, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. License Condition 17.A requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the application dated January 22, 1991, including any enclosures. Paragraph C.1.1 of Appendix C, "Internal Inspection," of the application dated January 22, 1991, states, "a radiographer or assistant radiographer shall be inspected during radiographic operations on an unannounced basis. Inspection shall not exceed 3 month intervals, or if a radiographer or assistant radiographer has not participated in radiographic operations for more than 3 months, the individuals shall be inspected the first time they perform radiography."

Contrary to the above, the licensee did not perform inspections of two radiographers between January 1 and September 18, 1996, and did not perform inspections of two other radiographers before the first time they performed radiography. (01013)

- B. 10 CFR 34.28(b) requires, in part, that the licensee conduct a program for inspection and maintenance of radiographic exposure devices at intervals not to exceed 3 months or prior to the first use thereafter to ensure the proper functioning of components important to safety. The licensee shall retain records of these inspections and maintenance for a period of 3 years.

Contrary to the above, between January 1 and June 30, 1996, the licensee did not perform inspections and maintenance of radiographic equipment. (01023)

- C. 10 CFR 34.26 requires that a licensee conduct a quarterly physical inventory to account for all sealed sources received and possessed under the license. The records of inventories are to be maintained for a period of 3 years from the date of the inventory and must include the quantities and kinds of byproduct material, the location of sealed sources, and the date of the inventory.

Contrary to the above, the licensee did not maintain a record of a quarterly inventory that included all sealed sources in its possession during the second calendar quarter of 1996. (01033)

- D. 10 CFR 20.1301(a)(2) requires that a licensee conduct operations so that the dose in any unrestricted area from external sources does not exceed 0.002 rem (2 millirem) in any one hour.

Contrary to the above, on September 19, 1996, the licensee did not conducted operations in a manner that limited dose rates in unrestricted areas to 2 millirem in any one hour. Specifically, the dose rate outside a camper truck where a radiographic source was stored was six millirem per hour. (01043)

- E 10 CFR 20.1302(a) requires, in part, that a licensee make or cause to be made surveys of radiation levels in unrestricted and controlled areas to demonstrate compliance with the dose limits for individual members of the public in 10 CFR 20.1301.

Contrary to the above, as of September 19, 1996, the licensee had not conducted surveys to determine radiation levels in an unrestricted area outside a storage location to demonstrate compliance with dose limits for individual members of the public. Specifically, the licensee had not done surveys outside the camper truck used to store an exposure device containing 83 curies of iridium-192. (01053)

- F. 49 CFR 172.403 requires, in part, with exceptions not applicable here, that each package of radioactive material be labeled, as appropriate, with two RADIOACTIVE WHITE-I, RADIOACTIVE YELLOW-II, or RADIOACTIVE YELLOW-III labels on opposite sides of the package. The contents, activity, and transport index must be entered in the blank spaces on the label.

Contrary to the above, on September 11 and 12, 1996, the licensee transported a radiographic exposure device containing 83 curies of iridium-192, outside the confines of its Fairbanks facility and the package of radioactive material was not labeled, with the appropriate radioactive material labels. (01063)

- G. 10 CFR 30.35(g) requires a licensee to keep records of information important to the safe and effective decommissioning of the facility in an identified location until the license is terminated by the Commission. If records of relevant information are kept for other purposes, reference to these records and their location may be used.

Contrary to the above, on January 30, 1997, the licensee was not keeping records of information important to the safe and effective decommissioning of the facility in an identified location. (01073)

These violations represent a Severity Level III problem (Supplement VI).

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violations and prevent recurrence, and the date when full compliance was achieved is already adequately addressed on the docket in Inspection Report No.030-31760/96-01 and letters from the Licensee dated January 23, and February 3, 1997. Therefore, no response to this Notice is required. However, Arctic Slope is required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect its corrective actions or its position. In that case, or Arctic Slope chooses to respond, clearly mark the response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission,

ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011.

Dated at Arlington, Texas
this 18th day of February 1997