

30-03528
09858

ENCLOSURE

NOTICE OF VIOLATION

Ashford Nuclear Center

License No. 52-11810-02

The following violations were identified during an inspection conducted on January 25, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 20.105(b)(2) requires a licensee to ensure that its licensed material is not possessed, used or transferred in such a manner as to create, in any unrestricted area and from radioactive material and other sources of radiation in its possession, radiation levels which, if an individual were continuously present in the area, could result in his receiving a dose in excess of 100 millirems in any seven consecutive days.

Contrary to the above, the licensee possessed its licensed material in such a manner as to create, in a hallway adjacent to the hot lab, radiation levels of 1 millirem per hour as measured through the glass window in the hot lab. Had an individual been continuously present in the area during seven consecutive days he could have received a dose in excess of 100 millirems.

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

2. 10 CFR 20.201(b) requires a licensee to make such surveys as may be necessary to comply with the regulations in each section of 10 CFR 20. A "survey" is defined in 10 CFR 20.201(b) as 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 circumstances.

Contrary to the above, the licensee did not conduct adequate weekly contamination surveys in that only two (2) swipes were taken for the entire Nuclear Medicine Department including the hot lab.

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

3. 10 CFR 20.401(a) requires that each licensee maintain records showing radiation exposures on Form NRC-5, in accordance with the instructions contained in that form, or on clear and legible records containing all the information required by Form NRC-5.

Contrary to the above, on January 25, 1985, exposure records containing the required information were not maintained. Specifically, the records did not reflect quarterly accumulated doses for the personnel for whom such monitoring is required since exposure records for five monthly reporting intervals were missing, and the licensee had made no evaluation of personnel exposures for those intervals.

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

4. 10 CFR 20.203(e) requires that rooms in which specified amounts of licensed material are used or stored be conspicuously posted "Caution Radioactive Material."

Contrary to the above, on January 25, 1985, the nuclear medicine waste storage closet was not posted for the presence of the radioactive material located inside.

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

5. License Condition 17 requires that licensed material be used in accordance with statements, representatives, and procedures contained in application dated September 11, 1979 and letter dated September 22, 1980.

Contrary to the above, the licensee did not use its material in accordance with two established procedures (identified below):

- a. Although established procedures require daily constancy checks on the dose calibrator, such checks had not been performed since July 1981.
- b. Although established procedures require swipes to be taken on final source containers of packages containing radioactive material received, such swipes had not been performed on packages received since July 1981.

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

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: MAR 05 1985