

ENCLOSURE

NOTICE OF VIOLATION

Department of The Navy

License No. 09-11026-01

The following violations were identified during an inspection conducted on July 22-23, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 20.203(e) requires a licensee to post each area in which licensed material is used or stored and which contains any radioactive material (other than natural uranium or thorium) in an amount exceeding 10 times the quantity of such material specified in Appendix C of 10 CFR 20, with a conspicuous sign or signs bearing the radiation caution symbol and the words: Caution Radioactive Materials.

Contrary to the above, the licensee did not post the radioactive material storage area, adjacent to the Drug Screening facility. On July 22, 1985, this area contained one hundred ten 55-gallon waste drums. Each drum contained up to 20 microcuries of Iodine-125 waste, an amount greater than 10 times the Appendix C value of 1.0 microcurie for Iodine-125.

This is Severity Level IV violation (Supplement VI).

2. 10 CFR 20.203(f) requires that each container of licensed material, not otherwise excepted, shall bear a durable, clearly visible label identifying the radioactive contents.

Contrary to the above, on July 22, 1985, one hundred ten 55-gallon drums of radioactive waste were not labeled as required. Each barrel contained radioactive material when initially stored, in excess of the limit shown in 10 CFR 20, Appendix C, and was not otherwise excepted from labeling.

This is Severity Level IV violation (Supplement VI).

3. License Condition 16 requires that, unless otherwise excepted, the licensee shall possess and use licensed material in accordance with statements, representations, and procedures contained in a letter dated May 24, 1979 with enclosed application; letters dated August 21, 1980 and April 9, 1982; Model ALARA Program contained in Appendix O of Regulatory Guide 10.8 (Rev. 1) "Guide for the Preparation of Applications for Medical Program," October 1980; and letters dated September 13, 1982, December 30, 1983, April 25, 1984, and June 29, 1984.

10 CFR 19.12 and the application dated, May 24, 1979, submitted in support of the license, state in part that persons will receive training in the applicable provisions of NRC regulations and the license concerning radiation protection.

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Contrary to the above, inadequate training was provided to an employee at the Drug Screening facility. This employee was performing \$20.205 radiation surveys on incoming packages containing radioactive materials without understanding the meter face readings, in that over 30 recent dose rate measurements were recorded in units of "m/m" rather than "mr/hr."

This is a Severity Level V 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: AUG 26 1985