

APPENDIX A

NOTICE OF VIOLATION

ICO/Universal Tubular Service, Inc.
Oklahoma City, Oklahoma 73147

Docket No.: 30-20303
License No.: 35-23142-01

During an NRC inspection conducted on July 23, 1985, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

1. License Condition 18 requires, in part, that the licensee possess and use licensed material in accordance with statements, representations, and procedures contained in letter dated September 21, 1984.

Specifically, Section B(5) of the Radiation Safety and Emergency Instructions enclosed with the above letter states, in part, that a calibration check shall be performed on each radiation survey meter at 6-month intervals, and a written record will be kept of all calibration checks.

Contrary to the above, two radiation survey instruments were not calibrated during the period March 1984, to March 1985, and records of calibrations were not maintained on July 23, 1985, for a third survey instrument.

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

2. 10 CFR 71.5(a) requires, in part, that no licensee shall transport any licensed material outside the confines of his plant or other place of use, or deliver any licensed material to a carrier for transport, unless the licensee complies with applicable requirements of the regulations appropriate to the mode of transport of the DOT in 49 CFR Parts 170-189.

- a. 49 CFR 173.415(a) requires, in part, that each shipper of a specification 7A package must maintain performance test records on file for at least 1 year after the latest shipment.

Contrary to this requirement, performance test records were not maintained on July 23, 1985, for shipments of a specification 7A package, transported on the public highways during the past year.

- b. 49 CFR 173.476(a) requires, in part, that each shipper of special form radioactive materials shall maintain performance test records for each source design on file for at least 1 year after the latest shipment.

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Contrary to this requirement, performance test records for each source design were not maintained on July 23, 1985, for the sealed sources transported on the public highways during the past year.

- c. 49 CFR 172.200 requires, in part, that each person who offers a hazardous material for transportation shall describe the hazardous material on the shipping paper.

Contrary to this requirement, the licensee offered licensed material for transportation without describing the material on the shipping paper.

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

3. License Condition 14.B requires, in part, that records of leak tests of sealed sources be maintained for inspection by the commission.

Contrary to this requirement, records of leak test were not maintained on July 23, 1985, for the tests purportedly performed during May 1985.

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

Pursuant to the provisions of 10 CFR 2.201, ICO/Universal Service, Inc. is hereby required to submit to this Office within 30 days of the date of the letter transmitting this notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 6th day of September, 1985.