

APPENDIX A

Robert-James Sales, Inc.
Docket No. 9901002/85-01

NOTICE OF VIOLATION

As a result of the inspection conducted on March 25-28, 1985, and in accordance with Section 206 of the Energy Reorganization Act of 1974 and its implementing regulation 10 CFR Part 21, the following violations were identified and categorized in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583 (March 8, 1984):

- A. Section 21.6 of 10 CFR Part 21 dated May 31, 1984, states, in part, "(a) Each...corporation...subject to the regulations in this part, shall post current copies of the following documents in a conspicuous position...(1) the regulations in this part, (2) Section 206 of the Energy Reorganization Act, and (3) procedures adopted pursuant to the regulations in this part."

Section 21.21 states, in part, "(a) Each...corporation...subject to the regulations in this part shall adopt appropriate procedures to: (1) provide for; (i) evaluating deviations; or (ii) informing the licensee or purchaser of the deviation in order that the licensee or purchaser may cause the deviation to be evaluated unless the deviation has been corrected...."

Contrary to the above:

1. Copies of 10 CFR Part 21 and Section 206 of the Energy Reorganization Act were not posted.
2. Appropriate procedures to evaluate deviations or inform the licensee or purchaser of the deviation did not exist.

This is a Severity Level V violation (Supplement VII).

- B. Section 21.31 of 10 CFR Part 21 dated May 31, 1984, states, in part, "Each...corporation...subject to the regulations in this part shall assure that each procurement document for a...basic component...specifies, when applicable, that the provisions of 10 CFR Part 21 apply."

Contrary to the above, it was noted that purchase order (PO) Nos. 132-47, J-141-362, and J-141-383 from Reactor Concepts, Inc. and PO No. 91190 from Niagara Mohawk Power Corporation to Robert-James Sales (RJS) specified 10 CFR Part 21 as an applicable requirement, but RJS POs to Marmon/Keystone (No. 6581), Stainless Manufacturing (No. 6561), Ideal Forging (No. 6582), Speedline (No. 6555), Sandvik Steel (No. 3232), and Camco Fittings (Nos. 3156, 3233, and 3924) did not similarly specify that 10 CFR Part 21 would apply.

This is a Severity Level V violation (Supplement VII).

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