

## APPENDIX A

Joseph T. Ryerson & Son, Inc.  
99900876/85-01

### NOTICE OF VIOLATION

As a result of the inspection conducted on August 12-16, 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(a) of 10 CFR Part 21, dated January 1, 1985 states: "Each individual, partnership, corporation or other entity subject to the regulations in this part, shall post current copies of the following documents in a conspicuous position on any premises, within the United States where the activities subject to this part are conducted (1) the regulations in this part, (2) section 206 of the Energy Reorganization Act of 1974, and (3) procedures adopted pursuant to the regulations in this part."

Contrary to the above, the Joseph T. Ryerson & Son, Inc., Philadelphia, Pennsylvania facility failed to post current copies of 10 CFR 21, Section 206 of the Energy Reorganization Act of 1974, and procedures adopted pursuant to 10 CFR 21 in a conspicuous position on its premises (85-01-01).

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

- B. Section 21.31 of 10 CFR Part 21 states: "Each individual, corporation, partnership, or other entity subject to the regulations in this part shall assure that each procurement document for a facility, or a basic component issued by him, her or it on or after January 6, 1978 specifies, when applicable, that the provisions of 10 CFR Part 21 apply."

Contrary to the above, Joseph T. Ryerson & Son, Inc., Philadelphia Plant, (J. T. Ryerson) failed to specify Part 21 as an applicable requirement on the following purchase orders (85-01-02):

1. J. T. Ryerson work order No. 9W14648A2 dated 1/13/84 to Morris, Wheeler & Co., Inc. and No. 9W14648A3 dated 1/13/84 to Lehigh Testing Laboratories. The Morris, Wheeler & Co., Inc. work order involved ASME SA36 Material (1 Channel 20'-0"). The Lehigh Testing Laboratories work order involved mechanical and chemical testing of one channel to ASME Section III Class 1, 1971 Edition through Winter 1971 Addenda. Both orders were issued by J. T. Ryerson to procure material or testing services to fill Bechtel purchase order (PO) 8856-F-74574 for ASME Section III, Class 1, SA-36 Material. Bechtel imposed the requirements of Part 21 on J. T. Ryerson.

2. J. T. Ryerson work order 8031-F-61459 dated 7/12/83 and 6064 dated 12/8/83 to Lehigh Testing Laboratories, for mechanical and chemical testing in order to upgrade stock material to meet requirements of ASME III, Class 2.

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