

License No. SUA-917
Docket No. 40-3453

Notice of Violation

Based on the results of the NRC inspection conducted on August 2-3, 1978, certain activities appear to be in noncompliance with NRC regulations as indicated below:

1. 10 CFR 20.103(a)(1) limits the inhalation of radioactive materials by individuals in any period of one calendar quarter to a quantity no greater than that which would result from inhalation for 40 hours per week for 13 weeks at uniform concentrations specified in Appendix B of Part 20.

Contrary to this requirement, five individuals were exposed to airborne uranium concentrations in the third quarter of 1977, which, when no credit for respiratory protective devices was applied due to an unauthorized use of such devices, could have resulted in intakes of approximately 1.2 to 1.8 times the limit specified in Appendix B, 10 CFR 20. (The inspector verified that corrective action had been taken prior to the inspection. No reply is required for this item.)

This is an infraction.

2. 10 CFR 20.103(c) provides that the licensee may make allowances for respiratory protection equipment in limiting the inhalation of airborne radioactivity when such equipment is used as stipulated in Regulatory Guide 8.15. Paragraph C.2 of this Guide states that equipment is to be selected such that the protection factor is greater than the multiple by which the peak concentration exceeds the limit in Appendix B to Part 20.

Contrary to this requirement, on May 2, 1978, respiratory protection equipment with a protection factor of 50 was used in the yellowcake dryer where the peak concentration was approximately 298 times the limit specified in Appendix B of Part 20.

This is an infraction.

3. 10 CFR 21.21(a) requires adoption of appropriate procedures to (1) provide for evaluation of deviations, and (2) assure that a director or responsible officer be informed of defects or failure to comply with the Atomic Energy Act of 1954, or NRC rules, regulations, orders or licenses.

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Contrary to this requirement, no such procedures had been adopted by the time of the inspection on August 3, 1978.

This is a deficiency.

4. 10 CFR 20.201(b) requires that each licensee shall make or cause to be made such surveys (evaluations) as necessary to comply with the regulations in Part 20.

Contrary to this requirement, evaluations of time weighted airborne radioactive material intakes during the period July through December 1977, were not performed to demonstrate whether or not intakes of radioactive materials exceeded the 40-hour control measure specified in 10 CFR 20.103(b)(2). (The inspector verified that corrective action had been taken since January 1978. No reply is required for this item.)

This is an infraction.

5. 10 CFR 40.64(b) requires each licensee authorized to possess more than 1000 kilograms of uranium to submit an inventory report within thirty (30) days after September 30 each year.

Contrary to this requirement, no such report was submitted in 1977.

This is a deficiency.

6. 10 CFR 21.6 requires that each licensee shall post copies of (1) Part 21, (2) Section 206 of the Energy Reorganization Act of 1974, and (3) procedures pursuant to Part 21, or a copy of Section 206 and a notice describing the other documents and stating where they may be found.

Contrary to this requirement, neither the documents described above nor the notice was posted on August 3, 1978.

This is a deficiency.