



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

May 22, 2008

Docket No. 03019941

License No. 06-20581-01

Steven W. Peterson, P.E.
Manager, Environmental Health & Safety
Goodrich Corporation
100 Wooster Heights Road
Danbury, CT 06810

**SUBJECT: INSPECTION 03019941/2007001, GOODRICH CORPORATION, DANBURY,
CONNECTICUT SITE AND NOTICE OF VIOLATION**

Dear Mr. Peterson:

On August 29, 2007, Craig Gordon of this office conducted a safety inspection at the above address of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selected examination of representative records. Additional information provided by electronic mail to Mr. Gordon on September 4, 2007 was also examined as part of the inspection. The findings of the inspection were discussed with you at the conclusion of the inspection and in a followup conversation with Mr. Gordon on May 12, 2008.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation (Notice) is enclosed that categories the two violations by severity level in accordance with the NRC Enforcement Policy. The violations involved the failure to receive required NRC approval prior to a change in licensed activities, when the Radiation Safety Officer was replaced with an unqualified individual, and the failure to issue dosimetry to specific individuals from January 2006 through June 2007 as required by your license. The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violations and prevent recurrence is already adequately addressed on the docket. These included a request to amend your license to have yourself designated as the Radiation Safety Officer after you completed the required training, and implementing changes in the dosimetry program to assure that each individual is monitored for radiation exposure as required. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

Another concern was identified which related to availability and recordkeeping of source inventories, leak tests, and annual audits. After careful consideration of the factors involved in this specific instance and in accordance with Section VI.A of the current NRC Enforcement Policy, this non-repetitive, licensee-identified, and corrected violation is being treated as a Non-Cited Violation. Specifically, this violation posed a minimal health and safety problem and

represents an isolated rather than a programmatic weakness in your radiation safety program. Similar violations of this type in the future may result in additional enforcement action.

Current NRC regulations are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Regulations, Guidance, and Communications**. The current Enforcement Policy is included on the NRC's website at www.nrc.gov; select **About NRC; Organization and Functions; Office of Enforcement; About Enforcement**; then **Enforcement Policy**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

Please contact Craig Gordon at (610) 337-5216 for any questions regarding this matter.

Sincerely,

Original signed by Marie Miller

Marie Miller, Chief
Security and Industrial Branch
Division of Nuclear Materials Safety

Enclosure:
Notice of Violation

cc:
State of Connecticut

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Security and Industrial Branch
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Enclosure:
Notice of Violation

cc:
State of Connecticut

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NOTICE OF VIOLATION

Goodrich Corporation
Danbury, CT

Docket No. 03019941
License No. 06-20581-01

During an NRC inspection that began on August 29, 2007, two violations of NRC requirements were identified, as discussed during the exit meeting held on May 12, 2008. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. Condition 12 of NRC License No. 06-20581-01 lists the Radiation Safety Officer as Dawn McCartin.

Contrary to the above, you failed to receive NRC approval prior to a change in licensed activities, when Dawn McCartin left the program in 2006, and the RSO was not replaced with a qualified individual.

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

- B. Condition 17 of NRC License No. 06-20581-01 requires, in part, that the licensee conduct its program in accordance with procedures contained in the application dated September 27, 2004.

Contrary to the above, the licensee failed to issue extremity dosimetry to specific individuals from January 2006 through June 2007.

This is a Severity Level violation IV (Supplement IV).

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance will be achieved is already adequately addressed on the docket in the inspection record. You are, however, required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001 with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information, so that it can be made available to the Public without redaction.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated This 22th day of May 2008