



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

May 5, 2000

Docket No. 030-20982

License No. 37-23370-01

Don B. Shumway, Sr.
President
Prime NDT Services, Inc.
5260 West Coplay Road
Whitehall, PA 18052

SUBJECT: INSPECTION NO. 030-20982/00-01

Dear Mr. Shumway, Sr.:

On April 26, 2000, Sheri Minnick of this office conducted a safety inspection at Whitehall, Pennsylvania 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. The findings of the inspection were discussed with you at the conclusion of the inspection.

Within the scope of this inspection, no violations were identified.

In accordance with Section 2.790 of the NRC's "Rules and Practices," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the Public Document Room. No reply to this letter is required.

Your cooperation with us is appreciated.

Sincerely,

Original signed by Judith A. Joustra

John D. Kinneman, Chief
Nuclear Materials Safety Branch 2
Division of Nuclear Materials Safety

cc:
Commonwealth of Pennsylvania

D. Shumway, Sr.
Prime NDT Services, Inc.

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DATE	5/8/00		5/8/00			

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PART I - LICENSE, INSPECTION, INCIDENT/EVENT, AND ENFORCEMENT HISTORY

1. AMENDMENTS AND PROGRAM CHANGES:
(License amendments issued since last inspection, or program changes noted in the license)

<u>AMENDMENT #</u>	<u>DATE</u>	<u>SUBJECT</u>
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None

2. INSPECTION AND ENFORCEMENT HISTORY:
(Unresolved issues; previous and repeat violations; Confirmatory Action Letters; and orders)

None

3. INCIDENT/EVENT HISTORY:
(List any incidents or events reported to NRC since the last inspection. Citing "None" indicates that the Nuclear Materials Events Database, regional event logs, event files, and the licensing file have no evidence of any incidents or events since the last inspection.)

None

PART II - INSPECTION DOCUMENTATION

- * References that correspond to each inspection documentation topic are in Inspection Procedure 87120, Appendix B, "Industrial Radiography Inspection References."

The inspection documentation part is to be used by the inspector to assist with the performance of the inspection. Note that not all areas indicated in this part are required to be addressed during each inspection. However, for those areas not covered during the inspection, a notation ("Not Reviewed" or "Not Applicable") should be made in each section, where applicable.

All areas covered during the inspection should be documented in sufficient detail to describe what activities and procedures were observed and/or demonstrated. In addition, the types of records that were reviewed and the time periods covered by those records should be noted. If the licensee demonstrated any practices at your request, describe those demonstrations. The observations and demonstrations you describe in this report, along with measurements and some records review, should substantiate your inspection findings. Attach copies of all licensee documents and records needed to support violations.

1. ORGANIZATION AND SCOPE OF PROGRAM:

(Management organization; authorities and responsibilities; authorized location of use; type, quantity, and frequency of byproduct material use; staff size; delegation of Radiation Safety Officer (RSO) functions; reporting chain-of-command; multiple field offices and temporary job sites)

President and RSO is Don Shumway.

13 ASNT certified radiographers and 2 assistant radiographers all report to Mr. Shumway.

Licensee performs radiography at fixed site in Whitehall, PA and temporary job sites. 70% of work in PA, 25% in Ohio (they have an Ohio license for radiography and have been inspected by the State of Ohio), and 5% of work spread out in DE, CT, NY, VA, NJ, and MD. They work under reciprocity for Agreement States. Last reciprocity was in MD and NY in 1998.

2. MANAGEMENT OVERSIGHT:

[Management support to radiation safety; RSO; program audits or inspections; authorized individuals; as low as is reasonably achievable (ALARA) reviews]

RSO performs audits of radiographers in accordance with the regs. Inspector reviewed records. Radiographer who had recently come back to work was audited on first use of RAM.

FACILITIES:

(Facilities as described; uses; control of access; engineering controls; separation of materials and explosives; containers labeled)

Facilities as authorized by license.

3. EQUIPMENT AND INSTRUMENTATION:

(Radiography devices, source assemblies, source changers, special equipment meet performance requirements; appropriate survey instruments, dosimeters, alarming ratemeters)

All equipment found to be properly maintained. Inspector viewed equipment and reviewed records and interviewed personnel with regards to the maintenance.

4. MATERIAL USE, CONTROL, AND TRANSFER:

(Materials and uses authorized; security and control of licensed materials; procedures for receipt and transfer of licensed material; inventories; utilization logs)

No problems identified.

Inspector extensively reviewed the use of 2 cesium-137 stopping sources (Amersham Model VD-HP) used at the North Star Project- Pruhoe Bay, Alaska in January 2000. These sources are used by RTD Quality Services personnel, working under Prime NDT's license. These sources are not radiographic sources, but rather stopping sources that are shutter type devices- the source never leaves the shielded housing. These sources are used in conjunction with x-ray

radiography being performed by RTD's personnel. Prime NDT appropriately called the NRC to check approval of this work on 12/22/99. The licensee adequately trained the workers, monitored their occupational exposure and maintained records of exposure, daily surveys, training, training exams, etc.

INSPECTION AND MAINTENANCE:

(Maintenance program; daily and quarterly inspections; records of defects; source modifications; Type B packages; 10 CFR Part 21 reports)

All equipment found to be properly maintained. Inspector viewed equipment and reviewed records and interviewed personnel with regards to the maintenance. Rich Shumway performs all extensive maintenance of cameras on a yearly basis. He is certified by Amersham for this task. Also, radiographers do quarterly maintenance that is required by regulation.

5. FIELD STATIONS AND TEMPORARY JOB SITES:

(Documents and records at field stations and temporary job sites; operating and emergency procedures; Agreement State licenses)

Inspector reviewed the documents of an outgoing radiography crew and interviewed the radiographer. Work being done was greater than a four hour drive to the site, therefore no observation of field site was done.

6. AREA RADIATION SURVEYS AND CONTAMINATION CONTROL:

[Radiological surveys (instruments, perimeter, storage devices, post-exposure, post-source exchange, storage area); leak tests (frequency, sealed sources, depleted uranium devices); handling of radioactive materials; records; and public doses]

Appropriate surveys are performed and documented.

TRAINING AND INSTRUCTIONS TO WORKERS:

(Interviews and observations of routine work; staff knowledge of all routine activities; Parts 19, 20, and 34 requirements; training programs, including written tests; supervisor, assistant training)

All radiographers as ASNT certified and appropriately trained as required by the regulations and license.

Last inspection identified two individuals who were not certified: Donald Bickford and Lynn Graves. The inspector verified that these individuals are not working under this license.

7. RADIATION PROTECTION:

[Radiation protection program with ALARA provisions; external dosimetry (dosimeters, direct reading dosimeters, alarming ratemeters); exposure evaluations; planned special exposures; dose and survey records and reports; annual notifications to workers; bulletins and other generic communications]

Licenses program in compliance with regulations. Inspector interviewed personnel, reviewed records, and observed use of dosimeters.

For 1999, the Landauer TLD reports indicated that the maximum yearly exposure was ~2.3 rem and the majority of workers received between 1-2 rem.

8. RADIOACTIVE WASTE MANAGEMENT:
(Storage areas; transfer; packaging, control, and tracking procedures; records)

NI

DECOMMISSIONING:

(Records relevant to decommissioning; decommissioning plan/schedule; notification requirements; cost estimates; funding methods; financial assurance; and Timeliness Rule requirements; changes in radiological conditions since decommissioning plan was submitted)

NI

9. TRANSPORTATION:
[Quantities and types of licensed material shipped; packaging design requirements; shipping papers; hazardous materials (HAZMAT) communication procedures; return of sources; procedures for monitoring radiation and contamination levels of packages; HAZMAT training; and records and reports]

Workers have HAZMAT training and were found to properly load the cameras for transport.

10. NOTIFICATIONS AND REPORTS:
(Reporting and followup of theft; loss; incidents; overexposures; radiation exposure reports to individuals; reporting Part 21 defects and certain equipment failures.)

No theft, loss, incident, overexposures.

POSTING AND LABELING:

(Notices; license documents; regulations; bulletins and generic information; area postings; and labeling of containers of licensed material; markings)

Appropriate posting observed by inspector.

11. INDEPENDENT AND CONFIRMATORY MEASUREMENTS:
(Areas surveyed and measurements made; comparison of data with licensee's results and regulations; and instrument type and calibration date)

Inspector surveyed radiography camera stored in transport truck and verified licensee's results using an Eberline RO-2 ion chamber calibration expires 6/2000.

12. VIOLATIONS, NCVs, AND OTHER SAFETY ISSUES:
(State requirement and how and when licensee violated the requirement. For NCVs, indicate why the violation was not cited. Attach copies of all licensee documents needed to support violations.)

None

13. PERSONNEL CONTACTED:
[Identify licensee personnel contacted during the inspection (including those individuals contacted by telephone).]

Don and Keith Shumway and one radiographer.

14. PERFORMANCE EVALUATION FACTORS (PEFs):

- | | | |
|----|--|-----------------------|
| A. | Lack of senior management involvement with the radiation safety program and/or RSO oversight | () Y (x) N |
| B. | RSO too busy with other assignments | () Y (x) N |
| C. | Insufficient staffing | () Y (x) N |
| D. | Radiation Safety Committee fails to meet or functions inadequately | (x) N/A () Y () N |
| E. | Inadequate consulting services or inadequate audits conducted | () N/A () Y (x) N |

Remarks (consider the above assessment and/or other pertinent PEFs with regard to the licensee's oversight of the radiation safety program).

20. SPECIAL CONDITIONS OR ISSUES:
(Special license conditions; year-2000 effects of computer software)

NI

PART III - POST- INSPECTION ACTIVITIES

1. REGIONAL FOLLOWUP ON PEFs:

None

2. DEBRIEF WITH REGIONAL STAFF:

(Post-inspection communication with supervisor, regional licensing staff, Agreement State Officer; and/or State Liaison Officer)

Debriefed Judy Joustra of clear inspection.

3. YEAR-2000 ISSUES:

(Convey, to the Nuclear Material Safety and Safeguards Year-2000 Coordinator, all year-2000 licensee-identified problems and corrective actions taken.)

NI

END