

APPENDIX A INDUSTRIAL RADIOGRAPHY INSPECTION RECORD (IP 87120)									
REGION IV									
Insp. Record #	00-02	License #	50-29015-01			Docket #	030-31760		
Licensee Name	ASCG Inspection, Inc.								
Street Address	301 Arctic Slope Avenue, Suite 100								
City, State, Zip	Anchorage, Alaska 99518-3035								
Location (Authorized Site) Being Inspected	<b>Field offices at:</b>  <b>ASCG Inspection, Inc.</b> <b>Lot 3A, Block 1 Subdivision,</b> <b>Dimond Industrial Center, 301</b> <b>Arctic Slope Avenue, Anchorage,</b> <b>Alaska</b>  <b>7930 King Street, Suite A,</b> <b>Anchorage, Alaska</b>  <b>54932 Coringa Avenue, Kenai,</b> <b>Alaska</b>  <b>ARCO EOA, Prudhoe Bay, Alaska</b>					<b>Temporary job site at:</b> <b>ARCO EOA, Prudhoe Bay,</b> <b>Alaska</b>			
Licensee Contact Name	Keenan E. Remele				Phone #	907-349-5148			
Priority	01	Program Code	03320		Description	Industrial Radiography			
Date of Last Inspection:		8/1999			Date of This Inspection		09/25/00		
Type of Insp.	Announced	X	Routine	X	Initial				
	Unannounced		Special						
Next Insp. Date	09/25/02	Normal		Reduced		Extended	X		
Justification for change in normal inspection frequency:		Per MC 2800 recommend an extension in inspection frequency based on good licensee performance.							
<b>Summary of Findings and Actions</b>									
No violations, Clear 591 or letter issued				X	Non-cited violations				
Violation(s), 591 issued		Violation(s), letter issued							

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Follow up on previous violations:		<b>N/A</b>			
Inspector - Printed Name	<b>Sabra L. Pope, Health Physicist</b>				
- Signature	<b>/RA/</b>	Date	<b>10/16/00</b>		
Inspector - Printed Name	<b>Bob Brown, Health Physicist</b>				
- Signature	<b>/RA/</b>	Date	<b>10/16/00</b>		
Approved - Printed Name	<b>Mark R. Shaffer</b>				
- Signature	<b>/RA/</b>	Date	<b>10/17/00</b>		
<b>PART I-LICENSE, INSPECTION, INCIDENT/EVENT, AND ENFORCEMENT HISTORY</b>					
<b>1.</b>	<b>AMENDMENTS AND PROGRAM CHANGES</b>				
License amendments issued since last inspection, or program changes noted in the license.					
Amendment No.	Date	Subject			
<b>13</b>	<b>12/22/98</b>	<b>License Renewal</b>			
<b>2.</b>	<b>INSPECTION AND ENFORCEMENT HISTORY</b>				
Unresolved issues; previous and repeat violations; Confirmatory Action Letters; and orders.					
<b>Clear 591 on 8/23/99 in Anchorage, Kenai, Kuparek, Prudhoe Bay, Alaska and on 8/28/00 in Fairbanks, Alaska.</b>					
<b>3.</b>	<b>INCIDENT/EVENT HISTORY</b>				
List any incidents or events reported to NRC since the last inspection. Citing "None" indicates that regional event logs, event files, and the licensing file have no evidence of any incidents or events since the last inspection.					
<b>NMED search on 9/18/00.</b>					
<b>Event: 000541 on 2/23/00</b>					
<b>Licensee is awaiting a report from AEA Technology QSA, Inc. on the equipment evaluation from this failure of the ball end of the drive cable breaking off during the disconnection of the drive assembly from the exposure device.</b>					
<b>PART II - INSPECTION DOCUMENTATION</b>					
NOTE: 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.

<b>1.</b>	<b>ORGANIZATION AND SCOPE OF PROGRAM</b>
<p>Management organization; authorities and responsibilities; authorized locations 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.</p> <p><b>John McCellan, President - Anchorage - Jim Kingrea, Sr. Vice President - Keenan Remele, RSO - Steve Ziegler, Project Supervisor - Radiographers and Trainees.</b></p> <p><b>ASCG dispatches radiographic operations from 8 field offices in Alaska. The corporate office is located in Anchorage and has duplicate copies of all of the required records for the Field Offices. A survey instrument calibration facility and the location of all shipping and receiving is located at the King Street, Anchorage location.</b></p> <p><b>FO in Prudhoe Bay, Alaska, ARCO EOA has ~ 24 radiographers and trainees under the oversight of a Project Supervisor.</b></p> <p><b>FO in Kenai, Alaska has ~4 radiographers on staff.</b></p> <p><b>Radiography is being conducted 6-7 days a week at the FO locations inspected.</b></p>	
<b>2.</b>	<b>MANAGEMENT OVERSIGHT</b>
<p>Management support to radiation safety; RSO; program audits or inspections; authorized individuals; as low as is reasonably achievable (ALARA) reviews.</p> <p><b>Management support to radiation safety appeared to be excellent. Keenan Remele, RSO provides radiation safety support to ASCG. The RSO conducts quarterly audits to ensure all regulatory requirements are met and also conducts a comprehensive annual audit of the radiation safety program including ALARA and employee training. Records of quarterly and annual audits are in Anchorage.</b></p>	
<b>3.</b>	<b>FACILITIES</b>

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

**Facilities were as described in the license. Inspected containers had been properly labeled.**

**4. EQUIPMENT AND INSTRUMENTATION**

Radiography devices, source assemblies, source changers, special equipment meet performance requirements; appropriate survey instruments, dosimeters, alarming rate meters.

**The licensee possesses 12 IR-100 radiography cameras, 18 660B's and 6 865's. The licensee has one IR-50 source changer. Survey instrumentation, alarming rate meters, and SRD calibration records are located in the Anchorage office. Current calibrations were reviewed by the inspector and determined to meet regulatory requirements. Licensee or manufacturer conduct all calibrations.**

**5. MATERIAL USE, CONTROL, AND TRANSFER**

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

**Materials had been used as authorized by the license. Security had been maintained by physically locking the cameras in the storage closets when not in use. Proper documentation of byproduct material transfers had been reviewed and met the regulatory requirements.**

**Utilization records were reviewed by the inspector and were determined to be adequate. Inventory records are maintained in the Anchorage office.**

**6. INSPECTION AND MAINTENANCE**

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

**Maintenance program has been conducted as required and daily equipment checks had been documented. Type B package certifications are maintained for all devices in the Anchorage office.**

**7. FIELD STATIONS AND TEMPORARY JOB SITES**

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

**A temporary job site was inspected at the ARCO EOA near their field office.**

**Job site documentation and equipment included dosimetry, alarming rate meters, and pocket dosimeters. The inspector observed that the licensee conducted confirmatory surveys during exposure.**

**Leak test records on site included the original leak test from the manufacturer.**

**Copies of all required documentation was reviewed by the inspector and appeared to contain the required information. Operating and Emergency procedures were reviewed and determined to be adequate.**

**8.**

**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.

**A review of licensee job sheets indicated that required surveys (camera, transportation, boundary), dosimetry, alarming rate meters and pocket dosimeter readings had been documented as required.**

**Licensee had the leak test results provided by the manufacturer and sources kept for a duration greater than 6 months had been leak tested as required. DU leak testing is conducted annually. All leak test records are maintained in the Anchorage office.**

**Boundary dose rates are calculated at the job site and verified by conducting surveys during operations. Storage areas had been surveyed and were determined to be within regulatory limits.**

**9.**

**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.

**The licensee maintains a file on each radiographer in the Anchorage office fully documenting their training.**

**Field office records reviewed included radiographer certification cards. Both appear to have met the training requirements of 10 CFR 34.43.**

**10.**

**RADIATION PROTECTION**

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

The licensee maintains a monthly film badge program with badges being supplied by a NVLAP approved vendor. Records are posted in the FO for employees to view.

Each radiographer is issued a "0-200 mR" direct reading pocket dosimeter at the beginning of each shift which is read periodically throughout the shift and results recorded on the job sheet. Calibrations are performed annually by the licensee.

Each radiographer is issued an alarming rate meter at the beginning of each shift which is functionality checked prior to beginning work. Calibrations are performed annually by the licensee.

All records are maintained in the Anchorage office.

11.	<b>RADIOACTIVE WASTE MANAGEMENT</b>
Storage areas; transfer; packaging; control, and tracking procedures; records.	
<b>No waste generated.</b>	
12.	<b>DECOMMISSIONING</b>
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.	
<b>A decommissioning file is maintained at the Anchorage office.</b>	
13.	<b>TRANSPORTATION</b>
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.	
<b>The licensee prepares and transports byproduct material and shipping papers reviewed contained the required regulatory information. Receipt and transfer records were reviewed and met applicable regulatory requirements. Annual HAZMAT training is given to personnel and records maintained in the Anchorage office.</b>	
14.	<b>NOTIFICATIONS AND REPORTS</b>
Reporting and followup of theft; loss; incidents; overexposures; radiation exposure reports to individuals; reporting Part 21 defects and certain equipment failures.	
<b>No thefts or losses of material for this inspection period.</b>	
15.	<b>POSTING AND LABELING</b>
Notices; license documents; regulations; bulletins and generic information; area postings; and labeling of containers of licensed material; markings.	

**NRC Form 3 and the locations of applicable regulations and documents posted as required. Storage rooms posted with Caution RAM sign. Each container reviewed is properly labeled.**

**16. INDEPENDENT AND CONFIRMATORY MEASUREMENTS**

Areas surveyed and measurements made; comparison of data with licensee's results and regulations; and instrument type and calibration date.

**Surveys with: Xetex Survey Meter SN 8142**  
**Bkgd: ~ .04 millirem per hour**  
**All areas surveyed: ~ bkgd**

**Temporary Job site surveys indicated the radiation area boundary established was ~ 5 mR/hr.**

**17. 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 noted this inspection period.**

**18. PERSONNEL CONTACTED**

Identify licensee personnel contacted during the inspection (including those individuals contacted by telephone).  
 Use # to indicate individual present at entrance meeting.  
 Use \* to indicate individual present at exit meeting.

Name	Title	Phone No.	In Person or By phone
# Lee Wheaton	Project Manager	907-659-5137	In Person
# Steve Ziegler	Project Manager	907-659-5137	In Person
# Jim Kingrea	Jim Kingrea	907-659-5137	In Person
*# Keenan Remele	RSO	907-267-6427	In Person

**19. PERFORMANCE EVALUATION FACTORS**

A.	Lack of senior management involvement with the radiation safety program and/or RSO oversight.		Y			N	X
B.	RSO too busy with other assignments.		Y			N	X
C.	Insufficient staffing.		Y			N	X
D.	RSC fails to meet or functions inadequately.	N/A	X	Y		N	

E.	Inadequate consulting services or inadequate audits conducted.	N/A	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N
<b>REMARKS</b> :(Consider the above assessment and/or other pertinent Performance Evaluation Factors (PEFs) with regard to the licensee's oversight of the radiation safety program)								
<b>Program has adequate oversight.</b>								
<b>20.</b>	<b>SPECIAL CONDITIONS OR ISSUES</b>							
NONE		Special license conditions; year-2000 effects of computer software and embedded systems.						
N/A								
<b>PART III - POST- INSPECTION ACTIVITIES</b>								
<b>1.</b>	<b>REGIONAL FOLLOWUP ON PEFs</b>							
<b>Continue to inspect at normal interval.</b>								
<b>2.</b>	<b>DEBRIEF WITH REGIONAL STAFF</b>							
Post-inspection communication with supervisor, regional licensing staff, Agreement State Officer; and/or State Liaison Officer.								
<b>The inspector's debriefed with staff and division management on 10/04/00.</b>								
<b>3.</b>	<b>YEAR-2000 ISSUES</b>							
Convey, to the NMSS Year-2000 Coordinator, all year-2000 licensee-identified problems and corrective actions taken.								
N/A								

**TO ADVANCE TO NEXT SECTION OF FORM - PUSH PAGE DOWN KEY**

<b>APPENDIX A - ATTACHMENT A DECOMMISSIONING TIMELINESS INSPECTION ATTACHMENT</b>									
Licensee:	ASCG Inspection, Inc.				Date of Inspection:	09/25/00			
<b>1.</b>	<b>COMPLIANCE WITH DECOMMISSIONING TIMELINESS RULE</b>								
(NOTE: Repeat the answers given in Section 12 of the main body of the inspection record. The issues in subsequent sections are dependent on the answers to these questions.)									
	A.	License to conduct a <i>principal activity</i> <u>has</u> expired or been revoked:	Y		N	<b>X</b>			
	B.	Licensee <u>has</u> made a decision to permanently cease <i>principal activities</i> at the entire site, or any separate buildings, or any outdoor areas, including inactive burial grounds:	Y		N	<b>X</b>			
	C.	A 24-month duration has passed in which no <i>principal activities</i> have been conducted under the license at the site, or at any separate buildings, or any outdoor areas, including inactive burial grounds:	Y		N	<b>X</b>			
	D.	If "Yes" to either A or B or C above:							
	(1)	Identify Site/Bldg./Area: <b>Not applicable below this section.</b>							
	(2)	Date of occurrence of A, B, or C:							
<b>2.</b>	<b>NOTIFICATION REQUIREMENTS</b>								
	A.	Licensee has provided written notification to U.S. NRC within 60 days of the occurrence of 1.A., 1.B., or 1.C. above.	Y		N				
	If "Yes," date of notification:								
	B.	If the licensee is requesting to delay initiation of the decommissioning process, the licensee <u>has</u> provided written notification to NRC within 30 days of occurrence of 1.A., 1.B., or 1.C. above:	N/A		Y		N		
	If "Yes," date of notification:								
Basis for Findings:									
<b>3.</b>	<b>DECOMMISSIONING PLAN/SCHEDULE REQUIREMENTS</b>								
	A.	Licensee is required to submit a decommissioning plan per 10 CFR 30.36(g), 40.42(g), 70.38(g), or 10 CFR Part 72?	N/A		Y		N		

If "No" to 3.A., answer the following items B - F:					
B.	The decommissioning work scope is covered by current license conditions.	Y		N	
C.	Decommissioning has been initiated within 60 days of notification to NRC, or NRC has granted a delay.	Y		N	
D.	If licensee has initiated decommissioning, give date the decommissioning was initiated:				
E.	If decommissioning has been completed, it was completed within 24 months of notification to NRC.	N/A	Y	N	
F.	If decommissioning is still scheduled to be completed, it is on schedule to be completed within 24 months of notification to NRC.				
		N/A	Y	N	
Basis for Findings:					
If "Yes" to 3.A., answer the following items G - J:					
G.	The decommissioning plan has been submitted to NRC within 12 months of notification.	Y		N	
If "Yes," date of submittal:					
If NRC approved, date of NRC approval:					
H.	Has the licensee submitted an alternative schedule request?	Y		N	
If "Yes," date of submittal:					
I.	If decommissioning has been completed, it was completed within 24 months after approval of the decommissioning plan.	N/A	Y	N	
J.	If decommissioning is still scheduled to be completed, it is on schedule to be completed within 24 months after approval of the decommissioning plan.				
		N/A	Y	N	
Basis for Findings:					
Violations identified, if any:					

**END**