UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931

February 13, 2001

S. K. McBryde, Inc.
ATTN: James E. Buchanan
Radiation Safety Officer
P.O. Box 579
Summerfield, North Carolina 27358-0579

SUBJECT: NRC RECIPROCITY INSPECTION REPORT 150-00032/01-01

Dear Mr. Buchanan:

This refers to the telephone conversation between us on February 7, 2001, regarding the results of the above-referenced Nuclear Regulatory Commission (NRC) inspection conducted on January 30, 2001. As a result of that inspection, an NRC Form 591, Safety Inspection, has been issued.

The enclosed form indicates that one item of non-compliance was identified during the inspection of your licensed activities. The response required is that the violation will be corrected within 30 days of your signature. Should you concur, please sign the Form 591 and return it to us. Should you have any questions, we shall be pleased to discuss them with you.

Your North Carolina radioactive materials license number 041-766-1 has been recognized, in accordance with 10 CFR 150.20, by NRC as valid for performance of licensed activities in non-Agreement States where NRC exercises jurisdiction. The recognition provides that NRC regulations shall be followed. The regulations in 10 CFR Part 34 apply to industrial radiography.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

Thank you for your cooperation. If you have any questions, please call me at (404) 562-4735.

Sincerely,

/RA/

David J. Collins, health Physicist
Materials Licensing Branch 2
Division of Nuclear Materials Safety

Docket No. 150-00032
License No. General (10 CFR 150.20)
North Carolina License No. 041-0766-1

Enclosure: NRC Form 591

cc w/encl:
State of North Carolina

PUBLIC DOCUMENT (circle one): YES NO

OFFICE	RII:DNMS	RII:DNMS	RII:DNMS				
SIGNATURE	/RA/	/.RA/	/RA/				
NAME	DJCollins	HBermúdez	JLHenson				
DATE	2/08/01	2/13/01	2/13/01	2/ /2001	2/ /2001	2/ /2001	2/ /2001
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: C:\SKMcBryde 591 ltr.wpd

NRC FORM 591 PART 1
(8-1997)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

SAFETY AND COMPLIANCE INSPECTION

1. LICENSEE	2. REGIONAL OFFICE
S. K. McBryde, Inc. **P. O. Box 579** **Summerfield, North Carolina 27358**	**REGION II** **US NUCLEAR REGULATORY COMMISSION** **ATLANTA FEDERAL CENTER** **61 FORSYTH ST SW STE 23T85** **ATLANTA, GA 30303-3415**
REPORT NUMBER(S) **01-01**	

3. DOCKET NUMBER(S)	4. LICENSE NUMBER(S)	5. DATE(S) OF INSPECTION
150-00032	**NC 041-0766-1**	**01/30/2001**

LICENSEE:
The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

☐ 1. Based on the inspection findings, no violations were identified.

☐ 2. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, NUREG-1600, to exercise discretion, were satisfied.

_____ non-cited violation(s) were discussed involving the following requirement(s):

☒ 3. During this inspection certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which is required to be posted in accordance with 10 CFR 19.11.

On January 30, 2001 at Carolina Steel Company, Bristol, Virginia, a temporary field use location, the licensee did not possess a copy of North Carolina radioactive materials license 041-0766-1, as required by 10 CFR 34.89(b)(1).

This is a Severity Level IV violation, Supplement VI (Fuel Cycle and Materials Operations)

STATEMENT OF CORRECTIVE ACTIONS

I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

TITLE	PRINTED NAME	SIGNATURE	DATE
LICENSEE			
NRC INSPECTOR	**/RA/**	**David J. Collins**	**2/7/01**

APPENDIX A INDUSTRIAL RADIOGRAPHY INSPECTION RECORD (IP 87120)												
REGION 2												C:\SKMcBryde 591 ltr.wpd
Insp. Record #	2001-01	License #	NC 041-0766-1	Docket #	150-00032							
Licensee Name	S.K. McBryde											
Street Address	P.O. Box 579											
City, State, Zip	Summerfield, NC 27358											
Location (Authorized Site) Being Inspected	Carolina Steel Corporation Abingdon Bridge Plant, Washington County Industrial Park Bristol, VA 24201											
Licensee Contact Name		Robin Morton, Radiographer			Phone #	336-852-0318						
Priority	1	Program Code	03320	Description	Industrial Radiography							
Date of Last Inspection:				Date of This Inspection	1/ 30 / 2001							
Type of Insp.	Announced		Routine	X	Initial							
	Unannounced	X	Special									
Next Insp. Date		Normal		Reduced		Extended						
Justification for change in normal inspection frequency:												
Summary of Findings and Actions												
No violations, Clear 591 or letter issued		Non-cited violations										
Violation(s), 591 issued	x	Violation(s), letter issued										
Follow up on previous violations:	None											
Inspector - Printed Name	David J. Collins											
- Signature	/RA/	Date	2 /7/2001									
Approved - Printed Name	Hector Bermudez											
- Signature	/RA/	Date	2/13/01									

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.		
Amendment No.	Date	Subject
		N/A
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 regional event logs, event files, and the licensing file have no evidence of any incidents or events since the last inspection.

No NMED records found.

PART II - INSPECTION DOCUMENTATION

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.

1.	ORGANIZATION AND SCOPE OF PROGRAM

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.

This area was not inspected during this inspection.

2.	MANAGEMENT OVERSIGHT

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

This area was not inspected during this inspection.

3.	FACILITIES

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

The temporary job site was inspected for restricted area control, personnel access, high radiation area access control, visual observation and posting. No violation was identified.

4.	EQUIPMENT AND INSTRUMENTATION

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

The inspector examined the licensee's survey instruments. The licensee possessed NDS 2000 survey instruments at the temporary job site. These instruments were appropriate for their intended use and as required in the regulations. Each survey instrument was operable. Each instrument examined had a calibration label which indicated when the instrument was last calibrated and who calibrated it. All instruments examined had a current calibration date that was within the required frequency of six months.

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.

The licensee uses a SPEC 150 radiographic exposure device, loaded with a 4.55 terabecquerels (123 curie) iridium 192 sealed source. The inspector reviewed, with the radiographer and the assistant radiographer, the operating and emergency procedures for conducting operations at the temporary job-site. The individuals demonstrated a sufficient understanding of the procedures and hazards. No violation was identified.

6.	INSPECTION AND MAINTENANCE

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

The inspector determined through interview with the radiographer and the assistant radiographer, that the appropriate daily inspection of the radiographic equipment, including the exposure device, self-reading dosimeters and alarming dosimeters, had been performed prior to initiating work. The inspector determined through observation of the equipment and observation of te conduct of operations, that the equipment was in good operating order and properly used. No violation was identified.

7.	FIELD STATIONS AND TEMPORARY JOB SITES

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

The inspector reviewed the operating and emergency procedures carried by the individuals at the job-site. The inspector determined that the radiographer did not possess a copy of the North Carolina License No. 041-0786-1 at the temporary job site as required by 10 CFR 34.89(b)(1).

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.

The inspector observed the setting of precautionary boundaries, and observed surveys by the radiographer and the assistant radiographer to verify the proper radiation restricted areas. The inspector observed the proper placement of high radiation area signage. The inspector observed conduct of operations to include post-exposure radiation surveys, lock-out of controls and pre-exposure warnings to staff in the area.

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 inspector interviewed the radiographer and the assistant radiographer. The radiographer is currently certified by ASNT (American Society for Non-Destructive Testing), an independent certifying agency, for radioisotope and x-ray radiography, as required by 10 CFR 34.43(a). The inspector determined thru interview that the assistant radiographer had sufficient knowledge to meet the requirements of 10 CFR 34.43(c). Both individuals demonstrated knowledge of emergency operating procedures and emergency notifications procedures. No violation was identified.

10.	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.

The inspector observed the self-reading dosimeters and the alarming dosimeters carried by both individuals at the temporary job-site. The utilization record indicated that the dosimeters and the ratemeters had been calibrated within the prescribed previous 12 month period. The individuals were also wearing the authorized vendor dosimeter of record, exchanged within the previous month. No violation was identified.

11.	RADIOACTIVE WASTE MANAGEMENT
Storage areas; transfer; packaging; control, and tracking procedures; records.	
This area was not inspected during this inspection.	

12.	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.	
No decommissioning records were identified.	

13.	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.	
The inspector reviewed the information available for transport of the radiography device to the temporary job-site. The transport container was properly marked and labeled. The device was properly marked and labeled with isotope, quantity, transport index, and packaging certification. The device packaging was properly secured and braced.	

14.	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 notifications or reports have been needed.	

15.	POSTING AND LABELING
Notices; license documents; regulations; bulletins and generic information; area postings; and labeling of containers of licensed material; markings.	
The inspector observed the radiographic operations area postings, the high radiation area postings, and the radiographic storage/transportation container in the radiographer's vehicle. All areas and materials were posted and/or labeled properly.	

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.

The inspector made comparison measurements with NRC SN 073475 Xetex 335B survey meter (calibrated 12/26/2000) in the vicinity of the SPEC 150 radiographic exposure device. The measurements for both NRC and licensee survey meters agreed within 10%. The measurements at the side of the radiographic device were respectively 77 and 74 millirem per hour at contact with the side closest to the source and 33 and 37 millirem per hour at the lockbox of the exposure device with the source in the shielded position. No violation was identified.

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.

On January 30, 2001, the radiographer did not possess a copy of the North Carolina License No. 041-0786-1 at the temporary job site as required by 10 CFR 34.89(b)(1). This is a Severity Level IV Violation, Supplement VII - Miscellaneous Matters.

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
<u>S.K. McBryde, Inc.</u>			
*James Buchanan	Radiation Safety Officer		By Telephone
#*Robin Morton	Radiographer		In Person
Rick Whitworth	Assistant Radiographer		In Person
<u>Carolina Steel</u>			
Dennis Mills	Quality Control Supervisor		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	X	Y		N	

REMARKS :(Consider the above assessment and/or other pertinent Performance Evaluation Factors (PEFs) with regard to the licensee's oversight of the radiation safety program)

20.	**SPECIAL CONDITIONS OR ISSUES**
NONE X	Special license conditions

PART III - POST- INSPECTION ACTIVITIES

1. REGIONAL FOLLOWUP ON PEFs

None Needed

2. DEBRIEF WITH REGIONAL STAFF

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

Debriefed with Branch Chief, communicated results to Agreement State Officer.

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

APPENDIX A - ATTACHMENT A DECOMMISSIONING TIMELINESS INSPECTION ATTACHMENT			
Licensee:	S.K. McBryde, Inc.	Date of Inspection:	1/30/2001

1.	**COMPLIANCE WITH DECOMMISSIONING TIMELINESS RULE**						
(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 *principal activity* has expired or been revoked:	Y		N	X	
	B.	Licensee has made a decision to permanently cease *principal activities* at the entire site, or any separate buildings, or any outdoor areas, including inactive burial grounds:	Y		N	X	
	C.	A 24-month duration has passed in which no *principal activities* have been conducted under the license at the site, or at any separate buildings, or any outdoor areas, including inactive burial grounds:	Y		N	X	
	D.	If "Yes" to either A or B or C above:					
		(1) Identify Site/Bldg./Area:					
		(2) Date of occurrence of A, B, or C:					
2.	**NOTIFICATION REQUIREMENTS**						
	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 has 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:							
3.	**DECOMMISSIONING PLAN/SCHEDULE REQUIREMENTS**						
	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	X	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: None identified

END