

CASE No. 4-1998-048

**United States
Nuclear Regulatory Commission**



Report of Investigation

BILL MILLER, INC.:

**DELIBERATE USE OF RADIOGRAPHICS WITHOUT
CERTIFICATION OR TRAINING**

Office of Investigations

Reported by Of: **RIV**

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FOIA- 2001-0355

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Title: BILL MILLER, INC.:

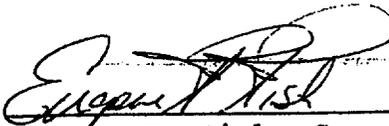
DELIBERATE USE OF RADIOGRAPHICS WITHOUT CERTIFICATION
OR TRAINING

Licensee:

Bill Miller, Inc.
117 North Sixth
Henryetta, OK 74437

Docket No.:

Reported by:


Eugene F. Fish, Special Agent
Office of Investigations
Field Office, Region IV

Participating Personnel:
Richard Leonardi, Radiation
Specialist, DNMS, RIV

Case No.: 4-1998-048

Report Date: February 22, 1999

Control Office: OI:RIV

Status: CLOSED

Reviewed and Approved by:


E. L. Williamson, Director
Office of Investigations
Field Office, Region IV

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ADMINISTRATIVE ACTION AND/OR CRIMINAL PROSECUTION.

SYNOPSIS

This investigation was initiated on October 7, 1998, by the Nuclear Regulatory Commission, Office of Investigations, Region IV, following an allegation that Bill Miller, Inc. (BMI), Henryetta, Oklahoma, an NRC licensee, was deliberately utilizing radiographic personnel in radiographic operations without proper certification or training.

Based on the evidence developed, testimony and documentation review, the allegation that BMI, specifically the [REDACTED] 70 [REDACTED] deliberately utilized radiographic personnel in radiographic operations without proper certification or training was substantiated.

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LIST OF INTERVIEWEES

	<u>Exhibit</u>
[REDACTED] BMI	19
[REDACTED]	3 & 8
[REDACTED]	2
[REDACTED]	9
[REDACTED]	10 & 13
[REDACTED] BMI	20
[REDACTED]	12 & 14
[REDACTED]	4 & 6
[REDACTED]	11 & 15

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On September 15, 1998, [REDACTED] 7C

On September 21, 1998, this information was provided to Russ WISE, Senior Allegations Coordinator, RIV, (Exhibit 5) for inclusion in an Allegation Review Board (ARB) discussion.

On October 5, 1998, the RIV:ARB recommended OI:RIV and the Division of Nuclear Materials Safety (DNMS) review the issue and determine a plan of action.

On October 7, 1998, the deputy director, DNMS, and OI:RIV agreed to call [REDACTED] and attempt to obtain specific information regarding this allegation.

Interview of Allegor (Exhibit 6)

[REDACTED] was interviewed by OI:RIV on [REDACTED] and reiterated the information previously provided (Exhibit 4) wherein [REDACTED] within the past year [1998], [REDACTED] 7C

Coordination with NRC Staff

Richard LEONARDI, Radiation Specialist, DNMS, RIV, assisted in the interviews pertinent to this investigation.

Review of Documentation

BMI Application for Material License, NRC Form 313, with attached Operating and Emergency Procedures, dated February 27, 1991 (Exhibit 7)

Section V, items 3.0-3.4 set forth the training requirements for qualifying radiographer's assistants. In particular, paragraphs [REDACTED]

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3.1 thru 3.3 mandated the administration of specified instruction and a written examination.

Section V, items 4.0-4.5, specified 40 hours of radiation safety training for prospective radiographers.

Section V, items 5.0-5.4, set forth the training program for personnel with previous radiation safety training and previous employees of BMI. It specified that rehires would receive the same training [Section V, items 3.0-3.2] as a new trainee and the administration of an examination.

Testimony

The following individuals were interviewed by OI:RIV regarding the allegation that BMI deliberately utilized radiographers without proper certification or training.

Interview of [REDACTED] (Exhibit 8)

[REDACTED] was interviewed by OI:RIV on [REDACTED] and advised that since last contact with the reporting agent (Exhibit 3), he [REDACTED]

Interview of [REDACTED] (Exhibit 9)

[REDACTED] He maintained that prior to performing any type of radiographic related work, he was provided a 40-hour radiation safety course by BMI in Henryetta, Oklahoma, in [REDACTED]. He was adamant in his recollection that at no time did he [REDACTED] ever perform any type of radiographic work without the direct supervision of a radiographer.

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Interview of [REDACTED] (Exhibits 10 & 13)

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[REDACTED]

[REDACTED] BMI, asked if he [REDACTED] had any experience to which [REDACTED] related his background with [REDACTED]. At that point, [REDACTED] was then instructed by [REDACTED] had received safety training.

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[REDACTED]

[REDACTED] stated he was [REDACTED] by [REDACTED] an NRC agreement state. While at this job site, he [REDACTED] worked with [REDACTED] BMI, who after initially [REDACTED]

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[REDACTED]

[REDACTED] added that during the approximately 2 months he worked with [REDACTED] he never observed [REDACTED] wear any type of radiation exposure device. 7C

AGENT'S NOTE: Based on assertions made by [REDACTED] that he worked for [REDACTED] and did not receive proper training or [REDACTED] this allegation was discussed before the February 1, 1999 RIV:ARB and resulted in the initiation of OI:RIV Case No. [REDACTED] 7C

Interview of [REDACTED] (Exhibits 11 & 15)

[REDACTED] was interviewed by OI:RIV on [REDACTED]. [REDACTED] advised he was [REDACTED] in the radiography field with BMI from [REDACTED]. He added that [REDACTED]. He recalled that upon being hired as an [REDACTED] (he was not provided any type of training nor was he administered any type of evaluation. He was however instructed to sign three or four sheets of paper [NFI] by [REDACTED] BMI. The next day, according to [REDACTED] he was sent to a job site in [REDACTED] an [REDACTED] where he worked with [REDACTED] Radiographer, BMI. Initially, [REDACTED] instructed him [REDACTED] on how to operate the applicable radiographic equipment. However, after several hours, he [REDACTED] was allowed to "shoot" the welds by himself while [REDACTED] was in an adjacent van processing film. [REDACTED] added that this practice continued for the remaining [REDACTED] weeks of the job. In summation, [REDACTED] maintained that with the exception of limited field instruction, he was never provided any formalized training nor given any evaluation during his employment with BMI. In conclusion, [REDACTED] stated he did not feel safe while employed with BMI. 7C

AGENT'S NOTE: Based on the testimony of [REDACTED] in which he alleged he worked for BMI and conducted radiographic operations without the supervision of [REDACTED] this information was discussed before the RIV:ARB on [REDACTED] 7C

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February 1999, [redacted] in the initiation of OI Case No. [redacted]

Interview (Exhibits 12 & 14)

[redacted] was interviewed by OI:RIV on [redacted]. [redacted] advised he was [redacted] in the radiography field with BMI from [redacted]. [redacted] recalled that upon being hired by BMI, he was given only cursory training on radiography equipment and then administered an examination by [redacted]. According to [redacted], [redacted] gave the examination questions to him [redacted] and then verbally instructed him as to what answers he [redacted] should circle. Within several days, [redacted] was sent to his [redacted] job site on a pipeline running from [redacted]. Upon his arrival at the job site, he was assigned to work with [redacted] Radiographer, BMI, who, after initially instructing him [redacted] how to operate the radiography equipment, allowed him [redacted] to "shoot" the welds alone while [redacted] was in an adjacent van processing film. This practice continued, on occasion, at several follow-on job sites near [redacted], a portion of which was conducted on the [redacted].

Review of Documentation

BMI Personnel/Training Records

On January 5, 1999, the personnel/training records for all personnel employed by BMI during [redacted] were examined. Of the 38 files reviewed, [redacted] were found to have discrepancies.

BMI Personnel/Training Record of [redacted]

The following items were contained in the BMI personnel/training file for [redacted]

1. Oral examination of [redacted]
2. Practical examination of [redacted]

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3. Training Progress Chart of [REDACTED] undated.
4. Personnel Training and Examination Record of [REDACTED]. This record reflected a [REDACTED]
5. W-4 Employee Withholding Certificate of [REDACTED]
6. 8-hour refresher course certificate of [REDACTED] for BMI [REDACTED]. This is the only item reflective of any training provided by BMI.
7. Letter from BMI to [REDACTED]

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BMI Personnel/Training Record of [REDACTED]

This file contained no documentation reflective of any initial training provided by BMI.

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BMI Oral Examination for Assistant Radiographers (Exhibit 17)

This was the oral examination allegedly given by BMI to new hires and rehired assistant radiographers.

BMI Written Examination No. 1 (Exhibit 18)

This was the written examination allegedly given by BMI to newly hired assistant radiographers.

Testimony

Interview of [REDACTED] (Exhibit 19)

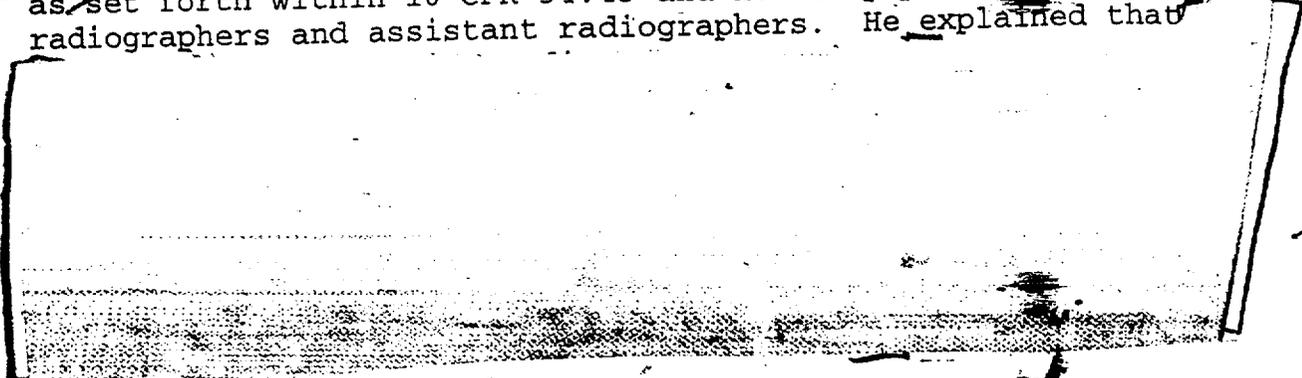
[REDACTED] was interviewed by OI:RIV on [REDACTED] and advised he had been employed in the radiography field since [REDACTED] and associated with BMI since [REDACTED] of BMI, he is [REDACTED]

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[redacted] acknowledged he was familiar with the training requirements as set forth within 10 CFR 34.43 and how they pertain to radiographers and assistant radiographers. He explained that



For [redacted] employees who [redacted]

[redacted] To verify the previous employment and training, [redacted] indicated they [BMI] called the previous employer and got verbal verification and requested written verification by fax or mail. He stated that BMI had never hired an individual whose claimed previous experience could not be verified, and he estimated that receipt of written verification usually took approximately 1 week. [redacted] admitted that, on occasion, when BMI had an immediate need for an assistant radiographer, they hired an individual with claimed experience, waved any initial verification of the claimed experience, administered an oral examination, and sent the individual into the field.

[redacted] claimed that BMI maintained training records on every individual who had ever worked for BMI. He went on to explain that as a matter of company policy, BMI never terminated any employee. For those employees for which there was no longer a continuing need, they were "laid off" and retained in an inactive status, regardless of time, until reactivated by BMI. This included those individuals who went to work for another company or those who did not engage in any radiographic related employment.

[redacted] was specifically queried on the BMI personnel/training file of [redacted] which included records of training and a [redacted] The file included no record of initial training by BMI. He offered that the [redacted] situation was one in which BMI had an immediate need for an assistant radiographer.

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According to [REDACTED] stated he had previously been trained and worked as an [REDACTED]. Based on these alleged admissions, [REDACTED] was hired by BMI on [REDACTED] and was administered an oral exam, but no written exam. When queried as to the discrepancy between the hire-on date by BMI, the hire-on date by [REDACTED] and the lack of BMI training documentation, [REDACTED] offered the following explanation: [REDACTED] for [REDACTED] BMI, [REDACTED] and [REDACTED] BMI. According to [REDACTED] BMI failed, [REDACTED] unknown reasons, to obtain copies of any training provided by [REDACTED] during [REDACTED] alleged [REDACTED] period of employment with [REDACTED]. The [REDACTED] records in the BMI file reflected [REDACTED] period of employment with [REDACTED]. In recollection, [REDACTED] claimed [REDACTED] called [REDACTED] for verification of previous employment and training. 7C

[REDACTED] was also queried on the personnel/training file of [REDACTED] which contained no record of any BMI initial training or evaluation. He explained that [REDACTED] was hired due to an immediate need for an assistant radiographer and claimed that he [REDACTED] admitted that he did not [REDACTED] 7C

[REDACTED] "just got busy and forgot." In regard to the 40-hour course for radiographers, [REDACTED] admitted that, on occasion, the full 40-hour course was not [REDACTED]. He explained that time constraints brought on by the immediate need for a trained radiographer in the field often precluded allowing an individual to receive the required full 40 hours of training.

In summation, [REDACTED] admitted there were cases where [REDACTED]

[REDACTED] He justified his actions by stating that requests for radiographic personnel at various job sites were often very short notice. He stated, "it's either turn the job down or just give them, you know, instructions, and know in your mind that they know what they're doing." In conclusion, [REDACTED] declared, "Most of our people, I think, are pretty well trained. I'm not saying that all of them is given the 40-hour deal, but they are given parts, you know--they are gone over it. It may be done in eight hours. I'm not saying, you know, but they are gone over and instructed, you know, how to be safe workers." 7C

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[REDACTED] BMI, was interviewed by OI:RIV on [REDACTED] and advised he had been in the radiography business for [REDACTED]. In addition to being [REDACTED] BMI [REDACTED] is [REDACTED]. He acknowledged being familiar with the training requirements as set forth in 10 CFR 34.43, but admitted that [REDACTED] handled most of the training for BMI. [REDACTED] explained the training procedures for new employees with no radiography experience and stated that for new employees with previous radiography experience, an effort was made to verify the experience. In those cases where the experience verification was not forthcoming, BMI ensured that the individual "knows what he is doing" before being sent to the field. In the case of assistant radiographers, a great deal of the responsibility for their proper job performance was placed on the radiographers who were in charge of the team. [REDACTED] stated he was aware that [REDACTED] in all cases but did feel that [REDACTED] of the personnel. [REDACTED] adamantly maintained that he would not allow anyone to conduct radiographic operations that did not have "enough common sense to follow instructions and to go by the procedures."

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Regarding the lack of training documentation in the file of [REDACTED] [REDACTED] claimed he had no knowledge of this matter. Regarding the file of [REDACTED] [REDACTED] reiterated the story that [REDACTED] provided, which indicated that [REDACTED] worked for [REDACTED] BMI, [REDACTED] and [REDACTED] with BMI. As for the [REDACTED] training records in [REDACTED] file, [REDACTED] indicated they were reflective of [REDACTED] employment with [REDACTED]. He was unable to offer any explanation as to a lack of BMI training documentation in the file.

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Regarding the utilization of assistant radiographers in the conduct of radiographic operations, [REDACTED] strongly maintained that BMI company policy dictated no assistant radiographer was allowed to conduct active radiographic operations without the direct supervision of a certified radiographer. He added that he had received no reports or indications that any BMI radiographic teams were violating that policy.

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[REDACTED] stated that BMI's training program "may have missed a fine point here or there" in regard to complying with the regulations.

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He maintained that prior to any individual going out on his first job for BMI, he [redacted] felt "perfectly safe that he [the assistant radiographer] is going to work in a safe environment, and that he is not going to do anything stupid, and that the people he's going to work with are going to be watching, to see that the procedures are followed, and everything's done the way it should be." 7C

In conclusion, [redacted] stated that he trusted [redacted] to perform his duties professionally but that as the [redacted] for BMI, [redacted] 7C

Contact with [redacted]

On January 7, 1999, [redacted] was contacted to verify the employment dates of [redacted] stated that [redacted] was from [redacted] 7C

Coordination with NRC Staff

On January 12, 1999, a meeting was held with DNMS, OE, and OI:RIV to discuss possible violations as well as potential corrective actions relevant to this investigation. A subsequent meeting was held with the Regional Administrator, DNMS, OE, Regional Counsel, and OI:RIV to discuss potential additional investigative activities (Exhibit 21).

On January 19, 1999, copies of the results of interviews with [redacted] and copies of the transcribed interviews of [redacted] (Exhibits 2, 3, 6, 8, 9, 10, 11, 12, 13, 14, 15, 19, & 20), were provided to Gary SANBORN, Enforcement Officer, RIV, and Ross SCARANO, Director, DNMS, RIV, for review. 7C

On February 1, 1999, a meeting between representatives of RIV:DNMS and OI:RIV was held to discuss additional allegations which surfaced during the staff review of the documents provided by OI:RIV. It was agreed that the need for additional OI:RIV investigative effort would be addressed at the next scheduled RIV:ARB.

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On February 1, 1999, the RIV:ARB was apprised of the investigative status to date. Based on the information provided, it was determined that further investigative effort by OI:RIV, regarding allegations relevant to this investigation, was not warranted. It was agreed that allegations, surfacing from this investigation and the DNMS staff review of OI:RIV documents, would be addressed as separate investigations.

On February 9, 1999, Elmo COLLINS, Chief, Nuclear Material Inspection Branch, DNMS, RIV, provided his written review (Exhibit 22) of the interviews pertinent to this investigation. COLLINS identified several issues, previously presented in oral fashion before the February 1, 1999, ARB:RIV, which he felt warranted additional investigative effort.

Agent's Analysis

On October 19, 1998, BMI was alleged to have deliberately utilized assistant radiographers, in the conduct of radiographic operations, without proper training or certification. Interviews of the [redacted] identified assistant radiographers determined that [redacted] of the individuals, [redacted] upon commencing their employment with BMI, were not provided any form of training nor administered the mandated examinations as required under 10 CFR 34.43. [redacted] these individuals were immediately sent to job sites, prior to receiving any form of training, where they conducted radiographic operations. [redacted] testified that as a result of this lack of training, he did not feel safe working for BMI. A review of 38 personnel/training files of BMI personnel disclosed that all but the files of [redacted] contained documented proof of a written examination thus establishing BMI's knowledge of the requirement. Under questioning, [redacted] admitted that while he was aware of the requirements set forth in 10 CFR 34.43, he [redacted]

In the case of [redacted] who worked for BMI on [redacted] had previous training with [redacted] which they [redacted] claimed they verified prior to his [redacted] period of employment with BMI. It was this training with [redacted] upon which they based their decision not to train or test [redacted] BMI. Documentation in BMI's personnel/training file of [redacted] indicated his [redacted] employment with [redacted] was subsequent to his [redacted] period of employment with BMI. [redacted]

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testified that his employment with [REDACTED] and inquiries with [REDACTED] confirmed [REDACTED] testimony. This evidence refuted [REDACTED] claim that [REDACTED] was previously trained by [REDACTED] prior to coming to work for BMI. 7C

Both [REDACTED] admitted that, on occasion, they have not followed training regulations to the letter. However, they [REDACTED] maintained that prior to [REDACTED] they felt the assistant radiographers were "pretty well trained," and BMI felt perfectly safe that they [assistant radiographers] were going to work in a safe environment.

Conclusions

Based on the evidence developed, testimony and documentation review, the allegation that BMI, [REDACTED] deliberately utilized radiographic personnel in radiographic operations without proper certification or training was substantiated. 7C

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SUPPLEMENTAL INFORMATION

On January 26, 1999, William P. SELLERS, Esq., Senior Trial Attorney for Regulatory Enforcement, Fraud Section, Criminal Division, U.S. Department of Justice, Bond Building, Room 2428, 1400 New York Avenue, N.W., Washington, D.C. 20005, was apprised of the results of the investigation. Mr. SELLERS advised that, in his view, the case did not warrant prosecution and rendered an oral declination.

On February 2, 1999, SANBORN was apprised of the Department of Justice decision to decline prosecution in this matter.

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LIST OF EXHIBITS

<u>Exhibit No.</u>	<u>Description</u>
1	Investigation Status Record, dated October 7, 1998.
2	Report of Interview with [REDACTED]
3	Report of Interview with [REDACTED]
4	Memorandum from FISH to file, dated September 15, 1998.
5	Memorandum from WILLIAMSON to WISE, dated September 21, 1998.
6	Report of Interview with [REDACTED]
7	-NRC Form-313 (Application for Material License) for BMI, dated February 27, 1991.
8	Report of Interview with [REDACTED]
9	Report of Interview with [REDACTED]
10	Report of Interview with [REDACTED]
11	Report of Interview with [REDACTED]
12	Report of Interview with [REDACTED]
13	Transcript of Interview with [REDACTED]

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- 14 Report of Interview with [REDACTED]
[REDACTED]
- 15 Transcript of Interview with [REDACTED]
[REDACTED]
- 16 BMI Personnel/Training Record of [REDACTED]
- 17 BMI Oral Examination for Assistant Radiographers.
- 18 BMI Written Examination No. 1. 7C
- 19 Transcript of Interview with [REDACTED]
[REDACTED]
- 20 Transcript of Interview with [REDACTED]
[REDACTED]
- 21 Memorandum from WILLIAMSON to file, dated
January 12, 1999.
- 22 Memorandum from COLLINS to WILLIAMSON, dated
February 9, 1999.

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