

IE-07  
PUBLIC

Consumers Scrap Recycling, Inc.  
ATTN: Maynard Blach  
Radiation Safety Officer  
7777 W. Chicago  
Detroit, MI 48204-2846

Dear Mr. Blach:

This refers to the routine safety inspection conducted by Mark Mitchell of this office on September 22, 1995, of activities authorized by NRC Byproduct Material License No. 21-26499-01, and to the discussion of our findings with you at the conclusion of the inspection.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and with the conditions of your license. The inspection consisted of a selective examination of procedures and representative records, observations, independent measurements, and interviews with personnel.

No violations of NRC requirements were identified during the course of this inspection.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original Signed by John D. Jones

John A. Grobe, Chief  
Nuclear Materials Inspection  
Section 2

License No. 21-26499-01  
Docket No. 030-33182

bcc: PUBLIC

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OFFICE	DRSS/RIII	E	DRSS/RIII						
NAME	MMITCHELL:bt		JAGROBE						
DATE	03/8/95		03/08/95						

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APPENDIX E

NOTE: All areas indicated in field notes are not required to be addressed during each inspection

INDUSTRIAL/ACADEMIC/RESEARCH INSPECTION FIELD NOTES  
Region 3

Inspection Report No: 95001

License No. 21-26499-01

Licensee (Name & Address):

Docket No. 030-33182

Consumers Scrap Recycling, Inc  
7777 W. Chicago  
Detroit, MI 48204-7846

Licensee Contact Mary Ann Birch

Telephone No. 313/491-8200

Last Amendment No. 01

Date of Amendment 9/10/93

Priority:

Program Code E2-7

Date of Last Inspection A/R

Date of This Inspection 2-22-95

Type of Inspection:

- Announced  
 Routine  
 Initial

- Unannounced  
 Special  
 Reinspection

Next Inspection Date 2-02  Normal  Reduced  Extended

Summary of Findings and Action:

- No violations cited, Clear <sup>Letter</sup> ~~591~~ issued  
 Violation(s), 591 issued  
 Violation(s), Regional letter issued  
 Followup on Previous Violations

Were non-cited violations identified during this inspection?  Y  N

Was proprietary information reviewed by or received by the inspector?  Y  N

Inspector: *Mark W. Mitchell*  
(Signature)

Date 2-7-95

Approved: *John J. ...*  
(Signature)

Date 3/08/95

1. INSPECTION HISTORY

N/A - Initial inspection

- A. Violations were identified during any of the last two inspections or two years, whichever is longer ( ) Y ( ) N  
 B. Response letter(s) or 591(s) dated \_\_\_\_\_  
 C. Open violations from previous inspections:

<u>Requirement</u>	<u>Violation</u>	<u>Corrective Action Taken (Y/N)</u>	<u>Status Open/Closed</u>

- D. Explain any previous violation(s) not corrected or repeated ( ) N/A

2. ORGANIZATION AND SCOPE OF PROGRAM

A. Organizational Structure

+ Mymond Black is RSO and yard supervisor.  
 Boguslaw ZABOKLINSKI is a yard Foreman and operator of the machine.  
 Mymond reports to the company principles.  
 + Individuals contacted during inspection  
 \* Individuals present at exit meeting

1. Meets license requirements [L/C] (X) Y ( ) N  
 2. Multiple authorized locations of use and/or laboratories ( ) Y (X) N  
 If yes, may use ATTACHMENT A as a guide for location(s) or lab(s) inspected and note lab numbers where violations are found. ( ) N/A

3. Briefly describe scope of activities, including types and quantities of use involving byproduct material, frequency of use, staff size, etc.

1 - Kevex Army Performance Analyzer 2002 is not working and has not worked or been used since purchased. it is in storage.

- B. Radiation Safety Committee required [L/C] ( ) Y (X) N  
 1. RSC fulfills license requirements [L/C] ( ) Y ( ) N  
 2. Records maintained [L/C] ( ) Y ( ) N

C. Radiation Safety Officer

- 1. Authorized on license [L/C]  Y ( ) N
- 2. Fulfills duties as RSO  Y ( ) N

- D. Use by authorized individuals [L/C]  Y ( ) N

Remarks:

*NO USE TO DATE*

3. TRAINING, RETRAINING, AND INSTRUCTIONS TO WORKERS

- A. Instructions to workers/students per [10 CFR 19.12]  Y ( ) N
- B. Training program required [L/C]  Y ( ) N

1. If so, briefly describe training program:

*MANUFACTURERS (PISON) TRAINING*

- 2. Training program implemented  Y ( ) N
- 3. Periodic training program required  Y  N
- 4. Periodic training program implemented  Y  N
- 5. Records maintained  Y ( ) N

- C. Individuals understanding of procedures and Regulations is adequate  Y ( ) N

- 1. Current operating procedures  Y ( ) N
- 2. Emergency procedures  Y ( ) N
- 3. Use of survey instrumentation  Y ( ) N

D. Revised Part 20

Workers cognizant of requirements for:

- 1. Radiation Safety Program [20.1101]  Y ( ) N
- 2. Annual dose limits [20.1301, 1302]  Y ( ) N
- 3. New forms 4 and 5 ( ) N/A  Y ( ) N
- 4. 10% monitoring threshold [20.1502]  Y ( ) N
- 5. Dose limits to embryo/fetus and declared pregnant worker [20.1208] ( ) Y  N
- 6. Grave Danger Posting [20.1902]  N/A ( ) Y ( ) N
- 7. Procedures for opening packages [20.1906]  N/A ( ) Y ( ) N
- 8. Sewer disposal limits [20.2003]  N/A ( ) Y ( ) N

**NOTE:** Deficiencies in this area, while not always a violation, should be brought to the attention of licensee management at the exit meeting and in the cover letter transmitting the inspection report or NOV.

Remarks:

4. INTERNAL AUDITS, REVIEWS OR INSPECTIONS

- A. Audits are required [L/C]  Y  N  
 B. Audits or inspections are conducted ~~( )~~  Y  N

(1) Audits conducted by RSO  
 (2) Frequency Monthly

- RSO conducts survey of machine to assure source shielding even though not used.  
 C. Content and implementation of the radiation protection program reviewed annually by the licensee [20.1101(c)]  Y  N  
 D. Records maintained [20.2102]  Y  N

5. FACILITIES

- A. Facilities as described in license application [L/C]  Y  N  
 B. Describe any Self-contained dry-source-storage irradiators [Part 36] and/or survey instrument calibrators (model, radionuclide, activity, use, etc.)  N/A

1. Maintenance of safety-related components performed by authorized persons [L/C]  Y  N  
 2. Access to keys and/or material controlled [20.1801, 1802, L/C]  Y  N  
 3. Access to high/very high radiation areas controlled [20.1601, 1602, L/C]  Y  N/A  
 4. Adequate protection of shield integrity, fire protection [L/C]  Y  N

Remarks:

Monthly meter survey by RSO.

6. MATERIALS

- A. Isotope, chemical form, quantity and use as authorized [L/C]  Y  N  
 B. Licensed materials secured to prevent unauthorized removal or access [20.1801, 1802]  Y  N  
 C. Leak tests and Inventories [L/C]  
 1. Performed as required  N/A  Y  N  
 2. Adequate analysis methodology and sensitivity  N/A  Y  N  
 3. Records maintained [L/C]  Y  N

Remarks:

Sources in storage in the machine.  
The machine has not been used as it does not work yet.

7. RADIATION SURVEYS

A. Instruments and equipment:

- 1. Appropriate operable survey instrumentation possessed and readily accessible [L/C]  Y  N
- 2. Calibrated as required [20.1501, L/C]  Y  N *N/A*
- 3. Calibration records maintained [20.2103(a)]  Y  N

B. Briefly describe area survey requirements [20.1501(a), L/C]:

*NOT required BUT they have a Bickon Micro R meter*

C. ~~Performed as required [20.1501(a), L/C]~~  Y  N

- 1. Contamination found  Y  N
- 2. Corrective action taken and documented  Y  N

D. Records maintained [20.2103, L/C]  Y  N

E. Protection of members of the public

- 1. Licensee made adequate surveys to demonstrate either (1) that the TEDE to the individual likely to receive the highest dose does not exceed 100 mrem in a year, or (2) that if an individual were continuously present in an unrestricted area, the external dose would not exceed 2 mrem in any hour and 50 mrem in a year [20.1301(a)(1), 1302(b)]  Y  N
- 2. Unrestricted area radiation levels do not exceed 2 mrem in any one hour [20.1301(a)(2)]  Y  N
- 3. Records maintained [20.2103, 2107]  Y  N

Remarks:

*MANUPROCESSOR'S SURVEYOR FILE*

8. RADIOACTIVE WASTE

A. Disposal

- 1. Decay-in-storage  N/A
- a. Procedures approved [20.2001(a)(2), L/C]  Y  N
- b. In accordance with [L/C]  Y  N
- c. Labels removed or defaced [20.1904(b)]  Y  N
- 2. Special procedures performed as required [L/C]  Y  N
- 3. Liquid scintillation (LS) media and animal carcasses per [20.2005]  N/A  Y  N
- 4. Improper/unauthorized disposals [20.2001]  Y  N
- 5. Records maintained [20.2103(a), 2108, L/C]  Y  N

B. Effluents

( ) N/A

1. Release into sanitary sewer [20.2003] ( ) N/A ( ) Y ( ) N

a. Material is readily soluble or readily dispersible [20.2003(a)(1)] ( ) Y ( ) N

b. Monthly average release concentrations do not exceed Appendix B values [20.2003] ( ) Y ( ) N

c. No more than 5 Ci of H-3, 1 Ci of C-14 and 1 Ci of all other radionuclides combined released in a year [20.2003] ( ) Y ( ) N

d. Procedures to ensure representative sampling and analysis properly implemented [20.1501(a)(2), L/C] ( ) Y ( ) N

2. Release to septic tanks [20.2003] ( ) N/A ( ) Y ( ) N

a. Within unrestricted limits [App B, Table 2] ( ) Y ( ) N

3. Waste incinerated ( ) N/A ( ) Y ( ) N

a. License authorizes [20.2004(a)(3)] ( ) Y ( ) N

b. Licensee directly monitors exhaust ( ) Y ( ) N

c. Airborne releases evaluated and controlled [20.1501, 1701] ( ) Y ( ) N

4. Control of effluents and ashes [20.1201, 1301, 1501, 2001, L/C] {See also IP 87102, RG 8.37} ( ) Y ( ) N

a. Compliance with air emissions requirements in Part 20:

Licensee has demonstrated compliance with air emission requirements in 10 CFR Part 20 ( ) Y ( ) N

Basis for compliance determination (circle one or more; provide basis below)

\_\_\_(1) Measured concentrations of radionuclides in air effluents are below Appendix B, Table 2 concentrations (and external dose < 50 mrem/yr)

\_\_\_(2) Bounding calculations show that air effluents could not exceed Appendix B, Table 2 concentrations (and external dose < 50 mrem/yr)

\_\_\_(3) Dose modeling shows that dose equivalent to the individual likely to receive the highest dose does not exceed 10 mrem/yr

\_\_\_(4) Licensee does not possess sufficient radioactive material to exceed Part 20 requirements

Basis for Determination: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

b. Description of effluent monitoring program

- 1. Monitoring system hardware equipment adequate ( ) Y ( ) N
- 2. Equipment calibrated as appropriate ( ) Y ( ) N
- 3. Air samples/sampling technique (charcoal, HEPA, etc.) analyzed with appropriate equipment ( ) Y ( ) N

Remarks:

c. Waste Management (X) N/A

- 1. Waste compacted [L/C] ( ) Y ( ) N
- 2. Storage area(s) ( ) N/A
  - a. Protection from elements and fire [L/C] ( ) Y ( ) N
  - b. Control of waste maintained [20.1801] ( ) Y ( ) N
  - c. Containers properly labeled and area properly posted [20.1902, 1904] ( ) Y ( ) N
  - d. Package integrity maintained [L/C] ( ) Y ( ) N

3. Packaging, Control and Tracking [App. F.III] [20.2006(d)]:

Note: The licensee's waste is likely to be Class A.

- a. Not packaged for disposal in cardboard or fiberboard boxes [61.56(a)] ( ) Y ( ) N
- b. Liquid wastes solidified, i.e., less than 1% freestanding liquid, and void spaces minimized [61.56(a), (b)] ( ) Y ( ) N
- c. Does not generate harmful vapors [61.56] ( ) Y ( ) N
- d. Structurally stable (will maintain its physical dimensions and form under expected disposal conditions) [61.56(b)] ( ) Y ( ) N
- e. Packages properly labeled [App. F.III.A.2] ( ) Y ( ) N
- f. Licensee conducts a QC program to ensure compliance with [61.55, 56] and includes management evaluation of audits [App. F.III.A.3] ( ) Y ( ) N
- g. Shipments not acknowledged within 20 days after transfer are investigated and reported [App. F.III.A.8] ( ) N/A ( ) Y ( ) N

4. Transfers to land disposal facilities ( ) N/A

- a. Transferred to person specifically licensed to receive waste [30.41, 20.2001(b)] ( ) Y ( ) N
- b. Each shipment accompanied by a manifest prepared as specified in Section I of Appendix F [20.2006(b), App. F.III.A.4] ( ) Y ( ) N
- c. Manifests certified as specified in Section II of Appendix F [20.2006(c)] ( ) Y ( ) N



D. Records of surveys and material accountability are maintained [20.2103, 2108]

( ) Y ( ) N

Remarks:

9. RECEIPT AND TRANSFER OF RADIOACTIVE MATERIAL

A. Describe how packages are received and by whom:

( ) N/A

*From manufacturer and installed by  
Manufacturers Service Rep.*

B. Written package opening procedures established and followed [20.1906(e)]

() Y ( ) N

C. All incoming packages with DOT labels wiped, unless exempted (gases and special form) [20.1906(b)(1)]

() Y ( ) N

D. Incoming packages surveyed per [20.1906(b)(2)]

() Y ( ) N

E. Monitoring in (C) and (D) above, performed within time specified [20.1906(c)]

() Y ( ) N

F. Transfer(s) between licensees performed per [30.41]

( ) Y ( ) N N/A

G. All sources surveyed before shipment and transfer [20.1501(a), 49 CFR 173.475(i), L/C]

() Y ( ) N

H. Records of surveys and receipt/transfer maintained [20.2103(a), 30.51]

() Y ( ) N

I. Transfers within licensee's authorized users or locations performed as required [L/C]

() N/A ( ) Y ( ) N <sup>1</sup>

J. Arrangements made for packages containing quantities of radioactive material in excess of Type A quantity [20.1906(a)]

() Y ( ) N

K. Package receipt/distribution activities evaluated for compliance with 20.1301 [20.1302]

() N/A ( ) Y ( ) N

Remarks:

10. TRANSPORTATION (10 CFR 71.5(a) and 49 CFR 170-189)

() N/A

A. Licensee shipments are:

- ( ) delivered to common carriers
- ( ) transported in licensee's own private vehicle
- ( ) both
- ( ) no shipments since last inspection

- B. HAZMAT training [172.700-704] ( ) Y ( ) N  
 C. Packages ( ) N/A
1. Authorized packages used [173.415, 416(b)] ( ) Y ( ) N
  2. Performance Test records on file ( ) N/A
    - a. Special Form Sources [173.476(a)] ( ) Y ( ) N
    - b. DOT-7A packages [173.415(a)] ( ) Y ( ) N
  3. COCs on file with NRC for Type B [71.12(c)(1)] ( ) Y ( ) N
  4. Two labels (White-I, Yellow-II, Yellow-III) with  
 TI, Nuclide, Activity, and Hazard Class  
 [172.403, 173.441] ( ) Y ( ) N
  5. Properly marked (Shipping Name, UN Number, Package  
 Type, RQ, "This End Up" (liquids), Name and  
 Address of consignee) [172.301,306,310,312,324] ( ) Y ( ) N
  6. Closed and sealed during transport [173.475(f)] ( ) Y ( ) N
- D. Shipping Papers ( ) N/A
1. Prepared and used [172.200(a)] ( ) Y ( ) N
  2. Proper {Shipping name, Hazard Class, UN Number,  
 Quantity, Package Type, Nuclide, RQ, Radioactive  
 Material, Physical and chemical form, Activity,  
 Category of label, TI, Shipper's Name, Certification  
 and Signature, Emergency Response Phone Number,  
 "Limited Quantity" (if applicable), "Cargo  
 Aircraft Only" (if applicable)} [172.200-204] ( ) Y ( ) N
  3. Readily accessible during transport [177.718(e)] ( ) Y ( ) N
- E. Vehicles ( ) N/A
1. Placarded [172.504] ( ) Y ( ) N
  2. Cargo blocked and braced [177.842(d)] ( ) Y ( ) N
  3. Proper overpacks (shipping name, UN Number,  
 labeled, statement indicating that inner  
 package complies with specification packaging)  
 [173.25] ( ) Y ( ) N
- F. Any incidents reported to DOT [171.15, 16]. ( ) Y ( ) N

Remarks:

11. PERSONNEL RADIATION PROTECTION

- A. Licensee performed exposure evaluation [20.1501] (✓) Y ( ) N  
 B. Licensee incorporated ALARA considerations in the  
 Radiation Protection Program [20.1101(b)] ( ) Y ( ) N

- C. External Dosimetry  N/A
1. Licensee monitors workers [20.1502(a), L/C] ( ) Y ( ) N
  2. External exposures account for contributions from airborne activity [20.1203] ( ) N/A ( ) Y ( ) N
  3. Supplier \_\_\_\_\_ Frequency \_\_\_\_\_
  4. Supplier is NVLAP-approved [20.1501(c)] ( ) Y ( ) N
  5. Dosimeters exchanged at required frequency [L/C] ( ) Y ( ) N
- D. Internal Dosimetry  N/A
1. Licensee monitors workers [20.1502(b), L/C] ( ) Y ( ) N
  2. Briefly describe licensee's program for monitoring and controlling internal exposures [20.1701, 1702, L/C]:
  3. Air sampling performed ( ) Y ( ) N
  4. Monitoring/controlling program implemented ( ) Y ( ) N
  5. Respiratory protection equipment [20.1703, L/C] ( ) Y ( ) N
- E. Reports  N/A
1. Reviewed by \_\_\_\_\_ Frequency \_\_\_\_\_
  2. Inspector reviewed personnel monitoring records for period \_\_\_\_\_ to \_\_\_\_\_
  3. Prior dose determined for individuals likely to receive doses [20.2104] ( ) Y ( ) N
  4. Maximum exposures TEDE \_\_\_\_\_ Other \_\_\_\_\_
  5. Maximum CDEs \_\_\_\_\_ Organs \_\_\_\_\_
  6. Maximum CEDE \_\_\_\_\_
  7. Licensee sums internal and external [20.1202] ( ) Y ( ) N
  8. TEDEs and TODEs within limits [20.1201] ( ) Y ( ) N
  9. NRC Forms or equivalent [20.2104(d), 2106(c)]
  - a. NRC-4 ( ) Y ( ) N Complete: ( ) Y ( ) N
  - b. NRC-5 ( ) Y ( ) N Complete: ( ) Y ( ) N
  10. Worker declared her pregnancy in writing during inspection period (review records) ( ) N/A ( ) Y ( ) N  
If yes, licensee in compliance with [20.1208] ( ) Y ( ) N  
and records maintained [20.2106(e)] ( ) Y ( ) N
- F. Who performed PSEs at this facility (number of people involved and doses received) [20.1206, 2104, 2105, 2204] ( ) N/A
- G. Records of exposures, surveys, monitoring, and evaluations maintained [20.2102, 2103, 2106, L/C] ( ) Y ( ) N

Remarks:

*No Badges Required*

12. NRC INDEPENDENT MEASUREMENTS

- A. Survey instrument                      Serial No.                      Last calibration  
                *Wellman 3*                      *45624*                      *8/94*
- B. Inspector's measurements were compared to licensee's ( ) Y ( ) N  
C. Describe the type, location, and results of measurements:  
*all specs at background.*

13. NOTIFICATION AND REPORTS

N/A

- A. Licensee in compliance with [19.13, 30.50] (reports to individuals, public and occupational, monitored to show compliance with Part 20) ( ) N/A ( ) Y ( ) N  
B. Licensee in compliance with [20.2201, 30.50] (theft or loss) ( ) None ( ) Y ( ) N  
C. Licensee in compliance with [20.2202, 30.50] (incidents) ( ) None ( ) Y ( ) N  
D. Licensee in compliance with [20.2203, 30.50] (overexposures and high radiation levels) ( ) None ( ) Y ( ) N  
E. Licensee aware of NRC Ops Center phone number ( ) Y ( ) N

14. POSTING AND LABELING

- A. NRC-3 "Notice to Workers" is posted [19.11]  Y ( ) N  
B. Parts 19, 20, 21, Section 206 of Energy Reorganization Act, procedures adopted pursuant to Part 21, and license documents are posted or a notice indicating where documents can be examined is posted [19.11, 21.6]  Y ( ) N  
C. Other posting and labeling per [20.1902, 1904] and the licensee is not exempted by [20.1903, 1905]  Y ( ) N

Remarks:

15. RECORDKEEPING FOR DECOMMISSIONING

N/A

- A. Records of information important to the safe and effective decommissioning of the facility maintained in an independent and identifiable location until license termination [30.35(g)] ( ) Y ( ) N  
B. Records include all information outlined in [30.35(g)] ( ) Y ( ) N

Remarks:

16. BULLETINS AND INFORMATION NOTICES

- A. Bulletins, Information Notices, NMSS Newsletters, etc., received by the Licensee  Y ( ) N
- B. Licensee took appropriate action in response to Bulletins, Generic Letters, etc.  Y ( ) N

Remarks:

*No action required.*

17. SPECIAL LICENSE CONDITIONS OR ISSUES

N/A

- A. Special license conditions or issues to be reviewed:
- B. Evaluation:

18. CONTINUATION OF REPORT ITEMS

N/A

19. VIOLATIONS, NCVs, AND OTHER ISSUES

N/A

Note: Briefly state (1) the requirement and (2) how and when the licensee violated the requirement. For non-cited violations, indicate why the violation was not cited.

20. DEBRIEF WITH LICENSING STAFF

Inspection findings discussed with licensing staff  N/A ( ) Y ( ) N

Items discussed:

21. EPA REFERRAL FORM

N/A

EPA referral form for air effluents sent to appropriate EPA regional office per IP 87102

( ) Y ( ) N

*Stated sources only*

22. PERFORMANCE EVALUATION FACTORS

Licensee (name & location)  
Consumers Shop.  
Detroit Mi

Inspector M. Mitchell  
Inspection Date 02-22-95

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

Remarks (consider above assessment and/or other pertinent PEFs):

Regional follow-up on above PEFs citations:

END

United States Nuclear Regulatory Commission

Region III

JBM  
8/31/93

MATTER TO BE REVIEWED DURING INSPECTION

Licensee Consumer Group Recycling

Location 7777 W. Chicago License No. 21-26499-01  
Detroit, MI. 48204-2816

Type of Matter to be Looked Into:

Unauthorized RSO change

Instructions:

licensee changed RSO's without submitting an amendment request. See letter dated August 26, 1993. I informed licensee that they were currently in violation. See conversation record dated August 31, 1993. Licensee will submit amendment request via overnight mail. Gary Shear, Section Chief, was informed of such violation on 8/31/93.

2/22/95 - Inspector advised licensee RSO  
TO ASSURE THAT ALL license conditions were  
MET.  
He called before RSO received. He  
was not in non compliance

J. J. Wilson  
Originator  
[Signature]  
Inspector

8/31/93  
Date  
2/22/95  
Date

\_\_\_\_\_  
Reviewer

\_\_\_\_\_  
Date

\_\_\_\_\_  
Investigator

\_\_\_\_\_  
Date

DO NOT REMOVE UNTIL INCIDENT CARD COMPLETED BY INVESTIGATOR. THIS WILL BE FILED ON TOP OF INSPECTION FINDINGS (417.591 or 592)