

RI - DNMS Licensee Event Report Disposition

Licensee:	Dept of Navy, Washington, DC		
Event Description:	Receipt of Radioactive Material Without Proper Controls		
License No: 45 23645-DIN7	Docket No:	MLER-RI: 2005-0254	
Event Date: 16 MARCH 05	Report Date: 4-21-05	HQ Ops Event #:	

1. REPORTING REQUIREMENT

<input type="checkbox"/>	10 CFR 20.1906 Package Contamination	<input type="checkbox"/>	10 CFR 30.50 Report
<input checked="" type="checkbox"/>	10 CFR 20.2201 Theft or Loss	<input type="checkbox"/>	10 CFR 35.3045 Medical Event
<input type="checkbox"/>	10 CFR 20.2203 30 Day Report	<input type="checkbox"/>	License Condition
<input type="checkbox"/>	Other _____		

2. REGION I RESPONSE

<input type="checkbox"/>	Immediate Site Inspection	Inspector/Date	<input type="text"/>
<input type="checkbox"/>	Special Inspection	Inspector/Date	<input type="text"/>
<input type="checkbox"/>	Telephone Inquiry	Inspector/Date	<input type="text"/>
<input type="checkbox"/>	Preliminary Notification/Report	<input type="checkbox"/>	Daily Report
<input type="checkbox"/>	Information Entered in RI Log	<input checked="" type="checkbox"/>	Review at Next Inspection
<input type="checkbox"/>	Report Referred To:	_____	

3. REPORT EVALUATION

<input checked="" type="checkbox"/>	Description of Event	<input checked="" type="checkbox"/>	Corrective Actions
<input checked="" type="checkbox"/>	Levels of RAM Involved	<input type="checkbox"/>	Calculations Adequate
<input checked="" type="checkbox"/>	Cause of Event	<input type="checkbox"/>	Additional Information Requested from Licensee

4. MANAGEMENT DIRECTIVE 8.3 EVALUATION

<input type="checkbox"/>	Release w/Exposure > Limits	<input type="checkbox"/>	Deliberate Misuse w/Exposure > Limits
<input type="checkbox"/>	Repeated Inadequate Control	<input type="checkbox"/>	Pkging Failure > 10 rads/hr or Contamination > 1000x Limits
<input type="checkbox"/>	Exposure 5x Limits	<input type="checkbox"/>	Large# Indivs w/Exp > Limits or Medical Deterministic Effects
<input type="checkbox"/>	Potential Fatality	<input type="checkbox"/>	Unique Circumstances or Safeguards Concerns
If any of the above are involved:			
<input type="checkbox"/>	Considered Need for IIT	<input type="checkbox"/>	Considered Need for AIT
Decision/Made By/Date: _____			

5. MANAGEMENT DIRECTIVE 8.10 EVALUATION (additional evaluation for medical events only)

<input type="checkbox"/>	Timeliness - Inspection Meets Requirements (5 days for overdose / 10 days for underdose)
<input type="checkbox"/>	Medical Consultant Used-Name of Consultant/Date of Report: _____
<input type="checkbox"/>	Medical Consultant Determined Event Directly Contributed to Fatality
<input type="checkbox"/>	Device Failure with Possible Adverse Generic Implications
<input type="checkbox"/>	HQ or Contractor Support Required to Evaluate Consequences

6. SPECIAL INSTRUCTIONS OR COMMENTS

Public

Inspector Signature: 

Date: 5/20/2005

Branch Chief Initials: 

Date: 5/25/2005



DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
2000 NAVY PENTAGON
WASHINGTON, DC 20350-2000
RECEIVED
REGION I

IN REPLY REFER TO

'05 APR 27 012:59

5104
Ser N455C/N5U9011319
21 April 2005

U.S. Nuclear Regulatory Commission
Division of Nuclear Materials Safety
Region I
475 Allendale Road
King of Prussia PA 19406

Ladies and Gentlemen:

SUBJECT: RECEIPT OF RADIOACTIVE MATERIAL WITHOUT PROPER
CONTROLS

A loss of control of licensed material reportable under Title 10, Code of Federal Regulations, Part 20.2201 occurred with an 89 Curie gamma radiography source. The source had been requested by the USS FRANK CABLE (AS 40) under Naval Radioactive Materials Permit (NRMP) No. 59-45255-A1NP, which authorizes receipt, possession and use of gamma radiography sources. NRMP No. 59-45255-A1NP was issued under the authority of the Navy's Nuclear Regulatory Commission Master Materials License No. 45-23645-01NA. Enclosure (1) provides the information required by Title 10, Code of Federal Regulations, Part 20.2201(b).

Sincerely,

L. L. FRAGOSO
Commander, MSC, U.S. Navy
Executive Secretary
Naval Radiation Safety Committee

Enclosure: 1. Report of Receipt of Radioactive Material
Without Proper Controls

Copy to:
NAVSEADET RASO
USS FRANK CABLE (AS 40)

**REPORT OF RECEIPT OF RADIOACTIVE MATERIAL
WITHOUT PROPER CONTROLS**

1. The material involved was an 89-Curie iridium-192 gamma radiography source, AEA Model 424-9, in an AEA Model 650L source changer. The source serial number was 20964B. The source changer serial number was 2161.

2. The USS FRANK CABLE (AS 40) submitted a requisition to Naval Inventory Control Point (NAVICP) for AEA gamma radiography sources as authorized by NRMP No. 59-45255-A1NP. NAVICP arranged for two gamma radiography sources to be shipped from AEA on separate dates. The gamma radiography source involved in this incident was shipped from AEA/QSA, Burlington, Massachusetts. The original Shippers Declaration of Dangerous Goods (SSDG) paperwork indicated the source was to be shipped to the USS FRANK CABLE in Guam with the Traffic Management Office at Travis Air Force Base (AFB) as the consignee. Emery Overland picked up the source from AEA on 16 February and the source arrived at Travis AFB on 17 February 2005. The USS FRANK CABLE did not receive notification that the source was being shipped from AEA. When at Travis AFB the consignee listed on the SDDG was changed by placing a sticker over the original consignee's name and handwriting the address for the USS FRANK CABLE on the sticker. This paperwork change resulted in the USS FRANK CABLE not being notified of the source shipment from Travis AFB. The source was shipped from Travis AFB by military cargo aircraft on 27 February 2005 and arrived at Andersen AFB in Guam on 28 February 2005. Immediately upon receipt, Andersen AFB transferred the source to Defense Distribution Depot Guam Marianas (DDGM). DDGM shipped the source to the USS FRANK CABLE Supply T-shed on 2 March 2005 under a manifest that did not identify the material as HAZMAT. T-shed personnel did not recognize that the material required special handling or that there were requirements for notification. On 14 March 2005, USS FRANK CABLE personnel performed monthly area radiation monitoring surveys that were unrelated to the receipt of the radiography source. These personnel discovered the gamma radiography source and notified the USS FRANK CABLE Radiation Safety Officer (RSO). At that time, certified gamma radiographers from the USS FRANK CABLE took control of the gamma radiography source, performed the surveys required in 10 CFR 20.1906(b), and transferred source to the NDT Storage Vault for storage. All required surveys were completed and no external contamination was noted. Contact radiation levels with the shipping container on 14 March 2005 were 19 mr/hr.

3. A certified radiographer from the USS FRANK CABLE NDT Laboratory took custody of the source and shipping container on 14 March 2005.

Enclosure (1)

4. The Radiation Health Officer conducted a dose investigation on 16 March 2005 and determined that no member of the public received a dose greater than the limits of 10 CFR 20.

5. The material has been recovered and is in the possession of certified gamma radiographers.

6. Corrective Actions

a. The following immediate corrective actions were taken to prevent reoccurrence:

(1) An inspection of the T-shed was conducted on 17 March 2005. The inspection revealed several improperly stowed HAZMAT items however none were radioactive. All discrepancies were corrected on the spot.

(2) HAZMAT training was conducted for the supply personnel at the T-shed on 21-22 March 05. The training covered storage, handling and identification of HAZMAT, and was given by a representative from Defense Distribution Center Philadelphia. The USS FRANK CABLE Radiation Safety Officer provided additional training to all T-shed personnel on 29 March 2005. This training covered radioactive material identification and handling requirements.

(3) All orders for new gamma radiography sources were cancelled.

b. The following permanent corrective actions have been put in place:

(1) No ordering of new gamma radiography sources will occur until permanent corrective actions have been put in place.

(2) An internal USS FRANK CABLE procedure was generated allowing only one gamma radiography source to be ordered under a requisition number. This action will prevent split shipments.

(3) Local requisition series designators for radioactive material have been established for USS FRANK CABLE requisitions. This will improve identification of Naval Nuclear Propulsion radioactive material and gamma radiography sources.

(4) The routing provider, Naval Operational Logistics Support Center (NOLSC), will release a message to shippers of Navy freight, including Travis AFB, reiterating the CFR instructions on radioactive material.

(5) NAVICP personnel are reviewing related regulations with the U.S. Transportation Command to clarify HAZMAT shipping requirements within the DoD system.

(6) NOLSC is conducting an investigation of the shipping incident that includes Travis AFB actions.

(7) Procedures for handling all HAZMAT at the USS FRANK CABLE Supply T-shed have been updated and visual displays are being placed in the T-shed to assist in the identification radioactive materials during the receipt process.

(8) The long-range training plan has been updated to include HAZMAT training on a quarterly basis and level of knowledge exams for T-shed personnel.

(9) Procedures are being developed requiring DDGM to inform the USS FRANK CABLE upon receipt of radioactive material prior to delivery and to request delivery instructions.

(10) USS FRANK CABLE is developing a Memorandum Of Agreement (MOA) with DDGM dealing specifically with the arrival of gamma radiography sources.