



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

May 1, 2006

EA-06-068

Mr. Drew H. McCorkle
Century Inspection, Inc.
P.O. Box 59126
10931 Indian Trail
Dallas, Texas 75229-3525

SUBJECT: NRC INSPECTION REPORT 030-06415/05-001 AND OI INVESTIGATION
REPORT NO. 4-2005-014 AND NOTICE OF VIOLATION

Dear Mr. McCorkle:

This refers to the inspection conducted on June 7, 2005, at your field station located in Prudhoe Bay, Alaska, and to the subsequent investigation conducted by the Nuclear Regulatory Commission's (NRC) Office of Investigations (OI). The inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations. Within these areas, the inspection consisted of a selected examination of records, observation of activities, and interviews with personnel. The preliminary inspection findings were discussed with Mr. Michael Joe Smallwood at the conclusion of the onsite portion of the inspection. A final exit meeting was conducted telephonically with you on April 4, 2006.

Based on the results of the inspection and investigation, the NRC has determined that two Severity Level IV violations of NRC requirements occurred. The violations involve failures to: (A) record actual readings on the calibration certificates during pocket dosimeter operability checks in accordance with approved operating procedures; and (B) determine the present activity of the source to be used for calibration. Further, the NRC has concluded that willfulness, in the form of careless disregard, was involved with Violation (A). This is because two of your trained radiation safety personnel changed the way pocket dosimeter operability checks were documented without ensuring the change met your approved procedures. Specifically, your personnel documented the expected readings on the calibration records instead of the required actual readings. However, we noted that the individuals stated that the calibrations were in fact performed, and pocket dosimeters that did not pass the check were removed from service.

Normally, Violation (A) would be classified as a minor violation; however, it becomes more significant because of the willfulness involved. The potential safety consequences with Violation (B) are limited because the inaccuracies introduced in calibrations would result in an over-response by radiation measuring devices. Therefore, in accordance with the NRC Enforcement Policy, these two violations have been categorized at Severity Level IV. The current Enforcement Policy is included on the NRC's web site at www.nrc.gov; select **What We Do, Enforcement**, and then **Enforcement Policy**. The violations are cited in the enclosed Notice of Violation (Notice) because they were identified by the NRC during the inspection.

The licensee's corrective actions for the failure to determine the present activity of the source to be used for calibration included updating the decay chart through the next several years. Additionally, the licensee performed supplemental training on the importance of using the correct activity when calibrating survey instruments.

The licensee's corrective actions for the failure to document actual readings on the calibration certificates associated with pocket dosimeter operability checks included supplemental training on their operating procedures, which require that actual instead of expected values be documented when performing these required operability checks.

The NRC has concluded that information regarding the reason for the violations, and the licensee's actions taken and planned to correct the violations and prevent recurrence, is already adequately addressed on the docket as stated above. Therefore, you are not required to respond to this letter or the enclosed Notice unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

Mark R. Shaffer, Chief
Nuclear Materials Inspection Branch

Docket No.: 030-06415
License No.: 42-08456-02

Enclosure:
Notice of Violation (Notice)

cc w/Enclosure:
Texas Radiation Control Program Director
Alaska Radiation Control Program Director

bcc w/Enclosure (via ADAMS distrib):

- MJohnson, OE
- CHMiller
- FDBrown
- MVasquez
- HAFreeman
- KDFuller
- LDWert
- CLCain
- MRShaffer
- JEWhitten
- JLThompson
- SLMerchant, OE
- DStarkey, OE
- MSchwartz, OE
- VCampbell
- KEGardin
- NMIB File
- RIV File (5th Floor)
- OEMail

SUNSI Review Completed: JLT

ADAMS: Yes No Initials: JLT

Publicly Available Non-Publicly Available Sensitive Non-Sensitive

DOCUMENT NAME: s:\dnms\nmib\!thompson\50641501.wpd

RIV:DNMS:NMIB	C:NMIB	ES:ACES	D:ACES
JLThompson	MRShaffer	MVasquez	KFuller
<i>/RA/</i>	<i>/RA/</i>	<i>/RA/</i>	<i>/RA/</i>
04/13/2006	05/01/2006	04/26/2006	04/29/2006

ENCLOSURE

NOTICE OF VIOLATION

Century Inspection, Inc.
Prudhoe Bay, Alaska

Docket No. 030-06415
License No. 42-08456-02
EA-06-068

During an unannounced NRC inspection and investigation conducted on June 7, 2005, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. Condition 18 of NRC License 42-08456-02 requires that the licensee conduct its program in accordance with the approved operating procedures submitted with the license application dated January 21, 2003. The licensee's approved operating procedures, "Procedures for Calibration of Dosimeters, 2.6.H," require that the actual exposure readings during pocket dosimeter operability checks be recorded on the calibration certificates.

Contrary to the above, the licensee failed to document the actual readings during annual pocket dosimeter operability checks. Specifically, from 2002 to 2005, the licensee recorded the expected readings instead of the actual readings on the calibration certificates during required pocket dosimeter operability checks at the field station in Prudhoe Bay, Alaska.

This is a Severity Level IV violation (Supplement VI).

- B. Condition 18 of NRC License 42-08456-02 requires that the licensee conduct its program in accordance with the approved operating procedures submitted with the license application dated January 21, 2003. The licensee's approved operating procedures, "Procedures for Calibration of Radiation Survey Instruments, 1.4," require the licensee to determine the present activity of the source to be used for calibration.

Contrary to the above, from 2002 to 2005, the licensee failed to determine the present activity of the source to be used for calibration. Specifically, calibration certificates for radiation survey instruments used at the Prudhoe Bay field station had the same activity (127.6 millicuries) listed for the cesium-137 source used for calibrations for the past four years.

This is a Severity Level IV violation (Supplement VI).

The NRC has concluded that information regarding the reason for the violations, and the corrective actions taken and planned to correct the violations and prevent recurrence, and the date when full compliance was achieved is already adequately addressed on the docket in the cover letter to this Enclosure. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. If you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region IV, at 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction.

In accordance with 10 CFR 19.11, you are required to post this Notice within two working days.

Dated this 1st day of May 2006