

APPENDIX E

INDUSTRIAL/ACADEMIC INSPECTION FIELD NOTES\*  
Region 1

Inspection Report No. 93-001

License No. 06-28789-01

Licensee (name and address)

Docket No. 030-32924

HRP Associates, Inc.

167 New Britain Avenue  
Plainville, Connecticut 06062

Licensee Contact Roy Cavanaugh

Telephone No. 203-793-6899

Last Amendment No. N/A

Date of Amendment N/A

Priority: 4

Program Code(s): 03121

Date of Last Inspection N/A

Date of This Inspection April 13, 1993

Type of Inspection:  Announced  Unannounced  
 Routine  Special  
 Initial  Reinspection

Next Inspection Date April 1997  Normal  Reduced  Extended

Summary of Findings and Action:

- No violations, Clear 591 or letter issued
- Violations, 591 or letter issued (NCV)
- Action on Previous Violations

Inspector: Stam R. Contemuche  
R. M. ... (Signature)

Date 4/21/93  
4/13/93

Approved: [Signature]  
(Signature)

Date 4/27/93

\* All areas indicated in field notes are not required to be addressed during each inspection.

B/1

1. ORGANIZATION

a. Briefly describe the organizational structure:

The Company is Controlled by three principals - John Houseman, Joe Rinaldi, and Mark Possidente; Associate Vice-President - Walter Gancarz; Radiation Safety Officer Richard Angelicola.

b. Organizational structure meets license requirements. [L/C]  Y  N

Remarks.

c. Licensee is required to have a Radiation Safety Committee  Y  N N/A

(1) If so, does RSC fulfill license requirements [L/C]  Y  N

(2) Records maintained  Y  N

Remarks.

d. Radiation Safety Officer

(1) Authorized on license [L/C]  Y  N

(2) Fulfills duties as RSO  Y  N

Remarks.

Richard Angelicola is the Radiation Safety Officer

2. INSPECTION HISTORY

N/A - Initial inspection

a. Last inspection conducted on \_\_\_\_\_

b. Violations or deviations were identified  Y  N

c. Response letter or 591 dated \_\_\_\_\_

d. Violations from Previous Inspection

<u>Requirement</u>	<u>Violation</u>	<u>Corrective Action Taken (Y/N)</u>	<u>Status</u>
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e. Any previous violations not corrected ( ) Y ( ) N N/A

Explain.

3. SCOPE OF PROGRAM

a. License has multiple authorized locations of use (X) Y ( ) N

b. If so, list location(s) inspected (X) N/A

*Temporary job sites are authorized. Currently work was being performed in Norwalk, CT but not on the day of the inspection.*

c. List those individuals contacted during inspection

Richard Angelicola, RSO Daniel J. Waida, Surveying Eng. Tech.

\* Roy Cavinaugh, Assit. RSO \* Richard McFee, Sr. Project Manager

\*Indicates presence at exit meeting

d. Briefly describe scope, including types of use involving byproduct material, frequency of use, staff size, etc.

*not more than* — The licensee possess one CPN moisture/density gauge containing 10 millicuries of Cesium 137 and 50 millicuries of Americium 241 Be. The gauge was purchased in December 1992 and had been used only once in Norwalk, Connecticut at a bridge construction site. The CPN gauge S/N M321101181, Model MC-3 is currently being stored at the Plainville facility. There are six certified users.

4. INTERNAL AUDITS OR INSPECTIONS

a. Audits are required by license condition ( ) Y ( ) N N/A

b. Audits or inspections are conducted ( ) Y ( ) N

(1) Audits conducted by \_\_\_\_\_

(2) Frequency \_\_\_\_\_

c. Records maintained. ( ) Y ( ) N

Remarks.

5. TRAINING, RETRAINING, AND INSTRUCTIONS TO WORKERS

a. Instructions to workers per [10 CFR 19.12]  Y  N

Remarks.

b. Training program required [L/C]  Y  N

(1) If so, briefly describe training program:

One day course at CPN, Corp.

(2) Training program implemented  Y  N  
(3) Retraining program required  Y  N  
(4) Retraining program implemented  Y  N  
(5) Records maintained  Y  N

Remarks.

Certificate of completion from CPN, Corp. on file.

6. FACILITIES AND EQUIPMENT

a. Facilities as described in license application [L/C]  Y  N

Remarks.

Permanent place of storage is at the Plainville facility.

b. Areas for storage and use of/RAM

(1) Adequate method used to prevent an unauthorized individual from entering restricted area  Y  N

(2) RAM is secured to prevent unauthorized removal from an unrestricted area [20.207]  Y  N

Remarks.

The CPN, Corp. gauge is stored in a lockable storage area, the transportation case and the handle to the gauge are also locked. For an added security measure the case is chained locked to the handle of a safe. The ISO and his ass't. maintain the keys

c. Survey instruments  N/A

(1) Appropriate operable survey instruments possessed  Y  N

(2) Calibration performed as required  Y  N

(3) Records maintained

( ) Y ( ) N N/A

Remarks.

7. RADIOLOGICAL PROTECTION PROCEDURES

- a. Radioactive materials used in accordance with current procedures [L/C]  Y ( ) N
- b. Individuals understanding of current procedures is adequate [L/C]

- (1) in general rules for safe use of RAM  Y ( ) N
- (2) in emergency procedures  Y ( ) N

Remarks.

Emergency and operating procedures are kept on file. Also, each operator will have copies with their shipping papers during transportation.

8. MATERIALS

- a. Isotope, chemical form, quantity and use as authorized [L/C]  Y ( ) N

Remarks.

Cesium-137, sealed sources, containing <sup>not more than</sup> 10 millicuries.

Americium-241, sealed neutron sources, containing <sup>not more than</sup> 50 millicuries.

Campbell Pacific Nuclear Corp. Model MC-3

- b. Leak tests and Inventory
- (1) Leak tests of sealed sources performed as required [L/C]  Y ( ) N
- (2) Inventory of RAM performed as required [L/C]  Y ( ) N
- (3) Records maintained  Y ( ) N

Remarks.

(a) Leak tests performed at six month intervals, analysed by CPA. Review record for 12/7/1992 time of purchase

(b) ~~Physical inventory is due in June 1993, required every six months.~~  
Review @ Next inspection

9. RECEIPT AND TRANSFER OF RADIOACTIVE MATERIAL

- a. Describe how packages are received and by whom:  N/A  
*Received original CPN moisture density gauge with sealed sources in Rec 92. Appropriate leak test certificate sent with gauge from manufacturer.*
- b. Opening procedures established and followed [20.205(d)]  Y  N
- c. Incoming packages wiped per [20.205(b)]  Y  N
- d. Incoming packages surveyed per [20.205(c)]  Y  N
- e. Transfer(s) performed per [30.41]  Y  N *N/A*
- f. ~~Records of surveys and receipt/transfer maintained per [20.401(b) and 30.51]~~  Y  N

Remarks.

10. AREA SURVEYS

N/A

Briefly describe area survey requirements and licensee's implementation [L/C]:

11. PERSONNEL RADIATION PROTECTION - EXTERNAL

- a. Film or TLD supplier Landauer Frequency Monthly
- b. Supplier is INVLAP - approved  Y  N
- c. Reports reviewed by RSD Frequency Monthly
- d. NRC inspector reviewed personnel monitoring records for period February 19, 1993 to \_\_\_\_\_
- e. NRC forms or equivalent *Only one month available.*
- |            |  |           |   |
|------------|--|-----------|---|
| (1) NRC-4: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Complete: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| (2) NRC-5: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Complete: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
- [20.401(a)]
- f. List maximum exposures (millirem):

*Minimum*

Remarks.

Inspectors reviewed the February Film badge reports. The licensee had not received the March report. Need to review at the next inspection.

12. PERSONNEL RADIATION PROTECTION - INTERNAL

N/A

- a. Potential for exposure of individuals to airborne RAM exists  Y  N
- b. Monitoring for airborne radioactivity conducted [20.201(b) to meet 20.103]  Y  N
- c. ~~Records maintained [20.401 and L/C]~~  Y  N
- d. Briefly describe licensee's monitoring system for airborne radioactivity [L\C]

- e. Bioassay program implemented as described in correspondence with NRC  Y  N

Remarks.

13. RADIOACTIVE EFFLUENT AND WASTE DISPOSAL

- a. RAM in effluents to unrestricted areas  Y  N ~~N/A~~
- b. Release in accordance with regulatory limits [20.106(a)]  Y  N

Remarks.

- c. Describe waste disposal method(s) - solid and liquid:

*No material disposed of at this time*

- d. If LLW is stored because access to a burial site has been denied, answer (1), (2), and (3) below:
- (1) Adequate control of waste in storage is maintained  Y  N N/A
  - (2) Package is labeled and package integrity is adequately maintained  Y  N
  - (3) Adequate records of surveys and material accountability are maintained  Y  N
- e. Disposal of waste in accordance with regulatory requirements [20.301]  Y  N
- f. Records maintained [20.401(b)]  Y  N

Remarks.

#### 14. NOTIFICATION AND REPORTS

- a. Licensee in compliance with [19.13] (reports to individuals)  Y  N  N/A
- b. Licensee in compliance with [20.402] (theft or loss)  Y  N  None
- c. Licensee in compliance with [20.403] (incidents)  Y  N  None
- d. Licensee in compliance with [20.405] (overexposures)  Y  N  None

Remarks.

No reported theft or loss, incidents or overexposures.

#### 15. POSTING AND LABELING

- a. NRC-3 "Notice to Workers" is posted [19.11]  Y  N
- b. Parts 19 and 20 and license are posted or a notice indicating where documents can be examined is posted [19.11]  Y  N
- c. Other posting and labeling per [20.203]  Y  N

Remarks.

- ice item 22 - NCV was issued at the time of the inspection. The licensee posted required forms by the storage room for the gauge and in the lunch room. (See Level 5)
- Caution Radioactive Material Signs posted on storage area and other areas in the vicinity.
- Issue Date: 02/19/91 E-8 Appendix E, 87100

16. ENVIRONMENTAL MONITORING PROGRAM

- a. Licensee has implemented an environmental monitoring program [L/C]
- b. Records maintained

Y  N  
 Y  N N/A

Remarks.

c. Briefly describe the licensee's environmental monitoring program:

17. TRANSPORTATION (10 CFR 71.5(a) and 49 CFR 171-189)

- a. Licensee makes shipments of RAM

Y  N

- b. Shipments are:

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

Remarks.

Licensee transported gauge from the Plainville, CT. <sup>facility</sup> to the Construction Site in Norwalk, CT. in the licensee's own Private Vehicle (Enclosed vehicle not an open-bed truck)

Complete only if shipments made since last inspection:

- c. Shipments

- (1) Authorized packages used [173.415,416]

Y  N  N/A

- (2) Package type used 7A (Manufacturer's case)

- (3) For DOT-7A packages, performance test record on file [173.415(a)]

Y  N  N/A

- |  |  |
|--|--|
| (4) For DOT-55 packages, use is approved by NRC [173.416(a)]               | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A            |
| (5) Other Type B packages used are approved [173.416(a)]                   | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A            |
| (6) Licensee has COCs on file with NRC [71.12(c)(1)]                       | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A            |
| (7) Licensee has a QA program approved by NRC [71.12(b)]                   | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A            |
| (8) For special form sources, performance test record on file [173.476(a)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A            |
| <del>(9) Packages properly labeled [172.403, 173.441]</del>                | <del><input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A</del> |
| (10) Packages properly marked [173.200]                                    | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A            |
| (11) Proper shipping papers prepared and used [172.200-204]                | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A            |
| (12) Shipping papers readily accessible during transport [177.817(e)]      | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A            |
| (13) Vehicles placarded as necessary [172.500, 504]                        | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A            |
| (14) Cargo blocked and braced [177.842(d)]                                 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A            |
| (15) Any incidents reported to DOT [171.15-16]                             | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> None           |

Remarks.

No reported incidents during transportation.

18. 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)] | <input type="checkbox"/> Y <input type="checkbox"/> N |
| b. Records include all information outlined in [30.35(g)]   | <input type="checkbox"/> Y <input type="checkbox"/> N |

Remarks.

19. INDEPENDENT MEASUREMENTS

- a. Survey instrument used Ludlum Model 14C
- b. NRC Serial No. 033506
- c. Last date of calibration November 6, 1992
- d. Inspector's measurements were compared to licensee's ( ) Y (X) N
- e. Describe the type and results of measurements:

~~Radiation Survey on outside of Transportation case and on contact with the gauge.~~

Radiation levels indicated 6 mR/hr on o/s of case  
" " 12 mR/hr on contact w/gauge

20. BULLETINS AND INFORMATION NOTICES

- a. Bulletins, Information Notices, etc., received by the licensee (X) Y ( ) N
- b. Licensee took appropriate action in response to Bulletins, INs, etc. ( ) Y ( ) N NI

Remarks.

21. CONTINUATION OF REPORT ITEMS - USE BACK OF PAGE IF NECESSARY

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22. LIST OF VIOLATIONS

*Item 15,  
10CFR 19.11*

NCV 10CFR 19.11 Documents were not properly posted or otherwise made available. Licensee posted the required documents in the lunchroom and by the gauge prior to the end of the inspection.

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23. PERFORMANCE EVALUATION FACTORS

Licensee (name & location) HRP Associates, Inc.  
167 New Britain Avenue  
Plainfield, Connecticut 06062

Inspector R. Gibson / S. Courtemanche  
Inspection Date 4/13/93

- a. Lack of senior management involvement with the radiation safety program and/or Radiation Safety Officer (RSO) oversight ( ) Y (X) N
- b. ~~RSO too busy with other assignments~~ ~~( ) Y (X) N~~
- c. Insufficient staffing ( ) Y (X) N
- d. Radiation Safety Committee fails to meet or functions inadequately ( ) Y ( ) N (X) N/A
- e. Inadequate consulting services or inadequate audits ( ) Y ( ) N (X) N/A

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

Regional follow-up on above PEFs citations: