

APPENDIX A
INDUSTRIAL/ACADEMIC/RESEARCH INSPECTION FIELD NOTES

Region I

Inspection Report No. 040-07102/98-001

License No. SMB - 743

Licensee (Name & Address):

Docket No. 040-07102

Shieldalloy Metallurgical Corp.
West Boulevard
Newfield, NJ 08344

Licensee Contact David Smith, RSO

Telephone No. 609-692-4200

Amendments Issued Since Last Inspection: (Numbers) Renewal

Dates of Above Amendments: October 20, 1997

Priority: 3

Program Code 11700

Date of Last Inspection May 20-21, 1997

Date of This Inspection July 27-28, 1998

Type of Inspection:

☐ Announced

☒ Unannounced

☒ Routine

☐ Special

☐ Initial

☐ Reinspection

Next Inspection Date February 1998 ☐ Normal ☒ Reduced ☐ Extended

Justification for change in normal inspection frequency:

→ Onsite remediation activities

→ Implementation of radiation control procedures

→ Follow-up to enforcement actions

Summary of Findings and Action:

☐ No violations cited, Clear NRC Form 591 or regional letter issued

☐ Violation(s), NRC Form 591 issued

☒ Violation(s), regional letter issued + *Inspector Report Also Issued*

☐ Followup on previous violations

See report for details not described in Field Notes

Inspector: Mauri Miller
(Signature)

Date 8/21/98

Approved: Mauri Goleto
(Signature)

Date 8/21/98

Field notes are to be used by the inspector to assist with the performance of the inspection. Note that all areas indicated in the field notes are not required to be addressed during each inspection. However, for those areas not covered during the inspection, a notation ("Not Reviewed") should be made in each section where applicable. Additionally, all areas covered during the inspection should be documented in sufficient detail to describe what activities and/or records the inspector observed. For example, the types of records that were reviewed and the time periods covered by those records should be noted. If the licensee demonstrates any practices at your request, describe those demonstrations. The observations and demonstrations you describe in this report, along with measurements and some records review, should substantiate your inspection findings.

NOTE: For inspections of radioactive drug distributors, ensure that all applicable sections (regarding 10 CFR Part 32) of the radiopharmacy field notes are completed.

1. **INSPECTION, LICENSING, AND INCIDENT HISTORY**

A. Violations were identified during any of the last two inspections or two years, whichever is longer. (N/A = Initial insp.) *See enforcement package.* ☐ N/A ☒ Y ☐ N

B. Response letter(s) or 591(s) dated _____

C. Violations from previous inspection(s):

<u>REQUIREMENT CITED</u>	<u>STATUS</u>

D. Any repeat violation(s) identified? ☐ Y ☐ N
If "Yes," explain:

11. **RECORDKEEPING FOR DECOMMISSIONING**

- A. Records of information important to the safe and effective decommissioning of the facility maintained in an independent and identifiable location until license termination. () Y () N
- B. Records include all required information [30.35(g)] () Y () N
- 40.24(3)
- (1) List of restricted areas [30.35(g)(3)] indicates that laboratories or other rooms have been released since the last inspection () Y () ☒ N
- (2) Confirmatory measurements show that each room is within release limits, and licensee records adequately document the basis for releasing each room () Y () ☒ N
- C. Copies of the licensee's decommissioning cost estimates and funding methods on file () ☒ Y () N
- D. If the licensee uses a parent company guarantee or a self-guarantee as funding method, does the file contain a copy of the financial test performed for the licensee's most recently completed fiscal year? () ☒ N/A () Y () N
- E. If "Yes" to D., do the financial test ratios meet the criteria in 10 CFR Part 30, Appendix A, Section II for parent company guarantees and Appendix C, Section II for self guarantees? () Y () N
- F. Date that licensee's financial assurance instrument was submitted to NRC, if applicable: Oct 1999 - alternative submittal required () N/A
- \$750,000 instrument has been drawn on by NRC.
- G. Date that licensee's decommissioning plan was submitted to NRC, if applicable: _____ () ☒ N/A
- H. Have radiological conditions at the licensee's facility changed since the financial assurance mechanism and/or decommissioning plan was submitted due to:
- (1) Incidents or events? () N/A () Y () N
- (2) Unplanned process upsets or changes? () N/A () Y () N
- (3) Unauthorized material, form, or possession limit changes? () N/A () Y () N
- (4) Any other changes? () N/A () ☒ Y () N
- If "Yes" to any of the above (1)-(4), Limited principal licensed activities notify regional management.

Basis for Findings (include comments and measurements on any areas the licensee released for unrestricted use):

The licensee stated that their efforts are continuing to develop a market, however the viability of a sustained market remains uncertain,

12. **COMPLIANCE WITH DECOMMISSIONING TIMELINESS RULE**

- A. License to conduct a *principle activity* has expired or been revoked () Y () ☒ N
- B. Licensee has made a decision to permanently cease *principal activities*, at the entire site, or any separate buildings, or any outdoor areas, including inactive burial grounds () Y () ☒ N
- C. A 24-month duration has passed in which no *principal activities*, have been conducted under the license at the site, or at any separate buildings, or any outdoor areas, including inactive burial grounds () Y () ☒ N
- D. If "Yes" to either A or B or C:
- (1) Identify Site/Bldg/Area: Haul Rd, Warehouse A
- (2) Date of occurrence of A, B, or C: Warehouse A - August 1994

NOTE: If "No" to A and B and C, decommissioning timeliness rule does not apply. If "Yes" to either A or B or C, then complete Attachment B, "Decommissioning Timeliness Field Notes," for this licensee.

Basis for Findings: 10 CFR 40.42 Failure to notify NRC within 60 days when no principal activities have been conducted for a period of 24 months and failure to begin decommissioning or submit within 12 months a notification plan.

13. **TRANSPORTATION (10 CFR 71.5(a) and 49 CFR 170-189)** () N/A

A. Licensee Transports: [complete sections (1) - (4), as applicable]

- (1) Limited Quantities, and/or Instruments and Manufactured Articles: (Radioactive Material, excepted package, [additional info], 7, UN 2910) () N/A
- (a) Package meets general design requirements [173.410] () Y () N
- (b) Radiation level ≤ 0.005 mSv/hr (0.5 mrem/hr) (Exclusive use instruments and articles, 2 mrem/hr) () Y () N
- (c) Contamination less than 173.443 limits, QC examination/test performed prior to each shipment [173.475(l)] () Y () N
- (d) Limited Quantity Package marked "Radioactive" [173.421(a)(4)] () Y () N
- (e) 173.422 certification statement attached/enclosed ("This package conforms to the conditions and limitations specified in...") () Y () N

See Inspection Report for details