

INDUSTRIAL - ACADEMIC INSPECTION REPORT

Inspection Report No. 87001

License No. 21-06367-02

Licensee (name and address)

Docket No. 030-04850

James River Corporation

100 Island Avenue

Parchment, MI 49004

Licensee Contact LIZ HOWARD

Telephone No. 616/384-6514

Last Amendment No. 11

Date of Amendment 6/26/85

✓ Priority 7/6

Category E2

Program Code 03120

Date of Inspection August 19, 1987

Type of Inspection: ( ) Announced (  ) Unannounced ( ) Normal  
( ) Initial ( ) Special (  ) Reinspection

Next Inspection Date ~~0897~~ \*\*\*\*

(  ) Normal ( ) Reduced ( ) Extended

Summary of Findings and Action:

- ( ) No Violation, Clear 591 issued
- (  ) Violation(s), 591 issued
- ( ) Violation(s), Appendix
- ( ) Action on Previous Violation
- ( ) Regional Action
- ( ) Headquarters Action

Inspector: James L Lynch  
(Signature)

8-20-87  
(Date Signed)

Approved: [Signature]  
(Signature)

8/20/87  
(Date Signed)

1. INSPECTION HISTORY

a. Items of noncompliance or safety items noted during last inspection conducted on 5/27/86 CP issued Yes  No

Corrected by letter dated ~~5/27/86~~ 9/5/86

b. Requirement Corrected Not Corrected

Lost Kr-85 source CLOSED

The generally licensed gauge was never found and is assumed scrapped.

c. If any items of noncompliance or safety items noted during the last inspection were not corrected, explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Organization

a. Organizational structure as described in application or letter Dated 11/1/84, Or \_\_\_\_\_

b. List primary licensee contact: \_\_\_\_\_ Telephone No. \_\_\_\_\_

c. Comments: Randy Schapaugh - Lab Administrator  
Elizabeth Howard - RSO  
John Goggin - Tech

3. SUMMARY OF LICENSED PROGRAM (Kind of program, number of people, rate of use or quantities on hand, places and frequency of use, type, quantity and use as authorized).

James River uses gas chromatograph ECD sources and a x-ray fluorescence analyzer in the paper mill and laboratory. These devices are covered under the specific license. Gauges and static eliminators are used in the paper mill under a general license. The specifically licensed sources are used by about 6 people, all under the supervision of the RSO. The analyzer is primarily used and stored at the mill (100 Island Ave), and the GCs are used at the lab (530 S. Riverview).

- (1) Texas Nuclear 9256 x-ray fluor. analyzer 20 mCi Fe-55, 0.5 uCi Am-241
- (1) Varian Aerograph 2400 g.c. 8 mCi Ni-63
- (2) Shimadzu Mini-2 g.c. 10 mCi @ Ni-63
- (1) Varian Aerograph 2400 g.c. 1000 mCi H-3 (storage)
- (2) Nuclear Chicago g.c. 10 mCi 2 Ni-63 @ (storage)

4. INTERNAL AUDITS OR INSPECTIONS

a. Required by L/C or application: Yes  No  If "Yes":

- 1) By whom RSO
- 2) Frequency Weekly Announced: \_\_\_\_\_ Unannounced: \_\_\_\_\_
- 3) Scope A weekly inventory of radioactive sources is performed by the RSO. This system was implemented after the lost source incident in 1986. The RSO was reminded to expand the inventory to include static eliminators.
- 4) Records maintained: Yes  No
- 5) Records reviewed: Yes  No
- 6) Period Reviewed: 1986-87

b. Comments (responsibility of auditor or committee, management control):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. TRAINING, RETRAINING, AND INSTRUCTIONS TO WORKERS

a. Training program specified in L/C or application: Yes  No

b. If training program is required, describe scope of program: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

c. Retraining required: Yes  No   
If "Yes" is retraining: Complete  Incomplete

- 1) Are tests and/or examinations required: Yes  No
- 2) If "Yes" are records available: Yes  No
- 3) Reviewed test results: Yes  No
- 4) Period reviewed: \_\_\_\_\_
- 5) Comments (per cent completed, test results, etc.): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

d. Training provided, but not covered above: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

e. Instructions to workers in accord with 10 CFR 19.12: Yes  No

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. RADIOLOGICAL PROTECTION PROCEDURES

- a. Operating and Emergency Procedures
- 1) Required by L/C or application: Yes  No
  - 2) Provided, but not required by L/C or application: Yes  No
  - 3) Procedures reviewed: Yes  No
  - 4) Appeared adequate: Yes  No
  - 5) Comments (personnel's understanding of procedures):  
Manufacturers instructions  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- b. Changes in procedures since last inspection: Yes \_\_\_\_\_ No
- 1) Were changes authorized: Yes \_\_\_\_\_ No \_\_\_\_\_
  - 2) Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. INSTRUMENTATION

- a. Type(s) of radiation survey instruments on hand as per L/C, application or equivalent: Yes \_\_\_\_\_ No  N/A
- 1) If "No" list changes: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- b. Capability of radiation survey instruments adequate for program:  
Yes \_\_\_\_\_ No \_\_\_\_\_
- c. Calibration of instruments required: Yes \_\_\_\_\_ No \_\_\_\_\_
- d. If "Yes", instruments calibrated in accord with requirements:  
Yes \_\_\_\_\_ No \_\_\_\_\_
- e. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. MATERIALS

a. Radioactive material secured to prevent unauthorized removal from:

- 1) Restricted area: Yes  No
- 2) Unrestricted area (20.207): Yes

b. Method of control appear adequate: Yes  No

c. Comments: The licensee received 3 gas chromatograph ECD sources from vendors in 1982 which were not authorized by the license. An 8 mCi Ni-63 source for a Varian 2400 g.c. and two 10 mCi Ni-63 sources for a Shimadzu Mini-2 g.c. were received. In 1985, the current RSO realized the need for addition of the sources on the license and had them added

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9. FACILITIES in the amendment or renewal. The license is now up-to-date and the RSO stated that she would maintain it in that manner.

a. Facilities described in letter or application: Yes  No

b. Facilities inspected: Yes  No

c. Comments: The possession of the 3 Ni-63 sources without license authorization is a violation of 10 CFR 30.3. The violation was corrected in 1985.

10. POSTING AND LABELING

a. Posting and labeling in accord with 10 CFR 20.203: Yes  No

b. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

11. RECEIPT AND TRANSFER OF MATERIAL

a. Procedures for picking up and receiving packages (10 CFR 20.205[b][c]):

- Yes  No
- 1) Incoming shipments monitored: Yes  No
- 2) Records of monitoring maintained (10 CFR 20.401[b]): Yes  No
- 3) Records reviewed by NRC inspector: Yes  No
- 4) Period reviewed: \_\_\_\_\_

b. Procedures for opening packages (10 CFR 20.205[d]): Yes  No

c. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

d. Records of receipt and transfer of material available (30.51[a]; 40.61[a]; 70.51[b][1]): Yes  No   
1) If "Yes", review of records was made by inspector: Yes  No   
2) Period reviewed: 1982-87  
3) Comments: \_\_\_\_\_

e. Packages on hand meet labeling requirements (49 CFR 173.399):  
Yes  No   
Comments: \_\_\_\_\_

f. Reports to commission required by L/C or regulation submitted:  
Yes  No   
Comments: \_\_\_\_\_

12. PERSONNEL RADIATION PROTECTION - EXTERNAL

a. Film or TLD badge supplier N/A

b. Badge exchange frequency \_\_\_\_\_

c. Reports reviewed by \_\_\_\_\_

d. Records reviewed for period \_\_\_\_\_ to \_\_\_\_\_ by NRC inspector

e. NRC forms or equivalent  
1) NRC-4 (20.102[b]): Yes  No  Complete: Yes  No   
2) NRC-5 (20.401[a]): Yes  No  Complete: Yes  No   
Maximum whole body quarterly exposure: \_\_\_\_\_  
Maximum extremity quarterly exposure \_\_\_\_\_  
3) Comments: \_\_\_\_\_

f. Pocket dosimeters used: Yes  No   
1) Type used: \_\_\_\_\_  
2) Frequency of recharging: \_\_\_\_\_  
3) Frequency of reading: \_\_\_\_\_  
4) Comments: \_\_\_\_\_

g. Direct radiation surveys of restricted and/or unrestricted areas being made: Yes  No   
1) Records of surveys being maintained: Yes  No   
2) Records of surveys reviewed: Yes  No   
3) Period reviewed: \_\_\_\_\_  
4) Comments: \_\_\_\_\_

13. PERSONNEL RADIATION PROTECTION - INTERNAL

a. Potential for exposure of individuals to airborne radioactive material exists: Yes \_\_\_\_\_ No

1) If "Yes" does program for monitoring and control exist:

Yes \_\_\_\_\_ No \_\_\_\_\_

2) Program for monitoring and control appears adequate:

Yes \_\_\_\_\_ No \_\_\_\_\_

b. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

c. Respiratory protection program required by L/C or application:

Yes \_\_\_\_\_ No

1) If "Yes" were respiratory protection procedures reviewed:

Yes \_\_\_\_\_ No \_\_\_\_\_

2) Respiratory protection procedures appear adequate:

Yes \_\_\_\_\_ No \_\_\_\_\_

3) Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

d. Bioassay program required: Yes \_\_\_\_\_ No

1) If "Yes" was bioassay program reviewed: Yes \_\_\_\_\_ No \_\_\_\_\_

2) Bioassay program appears adequate: Yes \_\_\_\_\_ No \_\_\_\_\_

3) Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

e. Smears and air samples:

1) Monitoring for airborne radioactivity is conducted (20.103):

Yes \_\_\_\_\_ No

a. Records of monitoring reviewed: Yes \_\_\_\_\_ No \_\_\_\_\_

b. Period reviewed: \_\_\_\_\_

c. Records of monitoring appears adequate: Yes \_\_\_\_\_ No

2) Smear surveys being conducted (20.201.b): Yes \_\_\_\_\_ No

a. Records of smear surveys reviewed: Yes \_\_\_\_\_ No \_\_\_\_\_

b. Period reviewed: \_\_\_\_\_

c. Records appeared adequate: Yes \_\_\_\_\_ No \_\_\_\_\_

3) Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

14. LEAK TESTS

a. Leak tests required: Yes  No \_\_\_\_\_

b. If "Yes" leak tests conducted: Yes  No \_\_\_\_\_

c. Records of leak tests maintained: Yes  No \_\_\_\_\_

d. Leak tests records reviewed: Yes  No \_\_\_\_\_

- e. Period reviewed: 1986-87
- f. Records of leak tests appear adequate: Yes  No
- g. Comments: Leak tests are performed semiannually. Contracted to Accuracy.

15. RADIOACTIVE EFFLUENT CONTROL AND WASTE DISPOSAL

- a. Byproduct material released to atmosphere and/or sewer (20.106 and 20.303):  
Yes  No
- b. Records of releases or radioactive effluents maintained (20.401):  
Yes  No
- 1) Period reviewed: \_\_\_\_\_
- 2) Records appear adequate: Yes  No
- c. Solid waste disposal method: Return to manuf. or commercial disposal
- 1) Records of disposal maintained (30.51): Yes  No
- 2) Surveys of waste prior to disposal made (20.201): Yes  No
- 3) Period reviewed: \_\_\_\_\_
- 4) Records of surveys appear adequate (20.401): Yes  No
- d. Comments: \_\_\_\_\_

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16. TRANSPORTATION (10 CFR 71.5a and 49 CFR 171-178) Yes N/A Vio

- a. Licensee makes shipments of RAM? ( ) (  ) ( )  
 Such shipments are:  
 ( ) delivered to common carriers?  
 ( ) transported in licensee's own vehicle as private carrier?  
 ( ) both?

Only from the paper mill to the lab.

If above is yes, complete items below:

- b. Are authorized packages used? [173.415-416] ( ) ( ) ( )  
 Package types used:  
 ( ) DOT-7A, Type A [173.415(a)] performance test records on file? ( ) ( ) ( )  
 ( ) DOT-55 [173.416(a)] licensee aware of 6/30/85 cutoff on use? ( ) ( ) ( )  
 ( ) Excepted, Instruments/articles [173.421-424]  
 ( ) LSA-strong tight [173.425(b)(1)]  
 ( ) NRC-Certified [173.416(b)]  
 NRC COC's on file? [71.12(c)(1)] ( ) ( ) ( )  
 Registered with NRC as user? [71.12(c)(3)] ( ) ( ) ( )  
 Documented NRC-Approved Q/A Program? [71.17(b)] ( ) ( ) ( )  
 NRC Q/A Approval No.: \_\_\_\_\_  
 ( ) Other: \_\_\_\_\_
- c. Special Form Material performance test records available for each source design? [173.476(a)] ( ) ( ) ( )
- d. Packages Labeled as required? [172.403(a)] ( ) ( ) ( )  
 ( ) Excepted  ( ) WI  ( ) YII  ( ) YIII  
 Surveys performed to select correct label category and compliance with Rad. Limits? [173.475(i)] ( ) ( ) ( )
- e. Packages Marked as required, i.e., proper shipping name, ID No., Spec. No., COC No., etc. [172.300]
- f. Shipping papers prepared for each shipment? [172.200] ( ) ( ) ( )  
 Such papers contain required information? [172.203(d)] ( ) ( ) ( )
- g. For Licensee private carrier shipments:  
 Vehicles placarded as required? [172.500, 172.504 Table 1] ( ) ( ) ( )  
 Cargo blocked, braced, tied down in vehicle? [177.842(d)] ( ) ( ) ( )  
 Any incidents reported to DOT? [171.15-16] ( ) ( ) ( )
- h. Does Licensee ship any radwaste? ( ) ( ) ( )  
 If yes, are shipments:  
 ( ) tendered to common carriers by licensee? ( ) ( ) ( )  
 ( ) tendered through a Radwaste Broker? ( ) ( ) ( )  
 If yes, name of Broker \_\_\_\_\_  
 Is licensee aware of 10 CFR 61 waste generator requirements? [10 CFR 61] ( ) ( ) ( )  
 Has licensee classified and characterized waste? [20.311(d)] ( ) ( ) ( )

17. NOTIFICATIONS AND REPORTS

a. Licensee in compliance with 10 CFR 19.13 (reports to individuals):  
Yes  No

b. Licensee in compliance with 10 CFR 20.405 (over exposure):  
Yes  No

c. Licensee in compliance with 10 CFR 20.403 (incidents):  
Yes  No

d. Licensee in compliance with 10 CFR 20.402 (theft or loss):  
Yes  No

e. Comments \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

18. POSTING OF NOTICES

a. Licensee in compliance with 10 CFR 19.11(a) or (b): Yes  No

b. Licensee in compliance with 10 CFR 19.11(c): Yes  No

c. Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

19. ENVIRONMENTAL MONITORING PROGRAM

a. Environmental Monitoring Program required: Yes  No

b. If "Yes" records reviewed: Yes  No

c. Period reviewed: \_\_\_\_\_

d. Records appeared adequate: Yes  No

e. If Environmental Program is not required, briefly describe any existing program: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

