

**INITIAL ARB ACTION PLAN SENSITIVE ALLEGATION MATERIAL RIII-07-A-0097 (PSI)**

License: Professional Service Industries (PSI)  
 Docket/License No: 030-33792/12-16941-03  
 Assigned Division/Branch: DNMS/MIB

Allegation Review Board Membership: Reynolds/ Heck/ Heller/ Pelke/ Madera

Purpose: Emergency ARB to discuss the CI concerns and approve the evaluation plan

GENERIC CONCERNS: If Yes Explain: \_\_\_\_\_

DISCUSSION OF SAFETY SIGNIFICANCE: CI discusses several safety significant bad practices

OI ACCEPTANCE: YES NO (Priority: HIGH NORMAL LOW )

Basis for OI Priority: \_\_\_\_\_ *RDS*

OI has Accepted Concern(s) No(s). \_\_\_\_\_ Signature \_\_\_\_\_

ARB MINUTES PROVIDED TO: Satorius/Langan/Madera *minutes distributed 12/27/07*

ACKNOWLEDGMENT LETTER: PRINT IN FINAL  REVERSE \_\_\_\_\_ N/A \_\_\_\_\_

REFERRAL LETTER: A. Licensee YES \_\_\_\_\_ 10 CFR 2.390 \_\_\_\_\_ NO   
 B. State of YES \_\_\_\_\_ NO   
 C. DOE YES \_\_\_\_\_ NO

date received	December 14, 2007	due date of 1 <sup>st</sup> ARB	January 13, 2008
due date of ACK Ltr	January 13, 2008	date -90 days old	March 13, 2008
date -120 days old	April 12, 2008	date -150 day old	May 12, 2008
date -180 days old	June 11, 2008	date -365 days old	December 13, 2008
projected date for the 5 yr statute of limitation			December 12, 2012

**COMMENTS:**

The CI **did** object to having identity released.  
 The CI **did** object to having the concern(s) forwarded to the licensee.

*[Signature]*  
 Allegation Review Board Chairman

*12/17/07*  
 Date

**SENSITIVE ALLEGATION MATERIAL**

*b-17*

Concern No. 1: Radiation boundaries are set at 500 mR/hr instead of the required 2 mR/hr.

Regulatory Basis: 10 CFR 34.53 post of boundaries

- I. Action Evaluation: The following method of resolution is recommended (circle):
- A. Send to Licensee Requesting Response in 30 Days. (Describe the general areas we expect the licensee to address.)
  - B. Priority RIII Follow up and Closure Memo to OAC
  - C. Follow up During Routine Inspection Within \_\_\_\_\_ Days and Closure Memo to OAC
  - D. Discrimination
    - 1. Offer ADR.
    - 2. Reason why ADR should not be offered
    - 3. Priority for the OI investigation if ADR is not used: HIGH/NORMAL/LOW  
Recommended Basis:
  - E. All other OI referrals. Priority for the OI investigation: HIGH/NORMAL/LOW  
Recommended Basis:
  - F. Outside NRC's Jurisdiction. Describe Basis Below.
  - G. Too General for Follow-up. Describe Basis Below.
  - H. Other.

Responsible for Action - \_\_\_\_\_

II. Special Considerations/Instructions:

At the December 17, 2007 ARB - for all of the concerns -

1. call the CI and obtain clarifying information and re-arb .

Concern No. 2: Assistants are performing radiography by themselves.

Regulatory Basis: 10 CFR 34.41 two person rule

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. Send to Licensee Requesting Response in 30 Days. (Describe the general areas we expect the licensee to address.)
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- D. Discrimination
  - 1. Offer ADR.
  - 2. Reason why ADR should not be offered
  - 3. Priority for the OI investigation if ADR is not used: HIGH/NORMAL/LOW  
Recommended Basis:
- E. All other OI referrals. Priority for the OI investigation: HIGH/NORMAL/LOW  
Recommended Basis:
- F. Outside NRC's Jurisdiction. Describe Basis Below.
- G. Too General for Follow-up. Describe Basis Below.
- H. Other.

Responsible for Action - \_\_\_\_\_

II. Special Considerations/Instructions:

At the December 17, 2007 ARB -

Concern No. 3: The CI was instructed to take exposures without a collimator (again saves setup time). On occasion, they use two un-collimated cameras to take an exposure.

Regulatory Basis: unknown if a regulatory requirement exists

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Recommended Basis:
- E. All other OI referrals. Priority for the OI investigation: HIGH/NORMAL/LOW  
Recommended Basis:
- F. Outside NRC's Jurisdiction. Describe Basis Below.
- G. Too General for Follow-up. Describe Basis Below.
- H. Other.

Responsible for Action - \_\_\_\_\_

II. Special Considerations/Instructions:

At the December 17, 2007 ARB -

Concern No. 4: The CI claims that they melted a source tip off a camera approximately a year ago November. This happened during the stress relief of piping welds.

Regulatory Basis: 10 CFR 30.50a, reporting requirements

I. Action Evaluation: The following method of resolution is recommended (circle):

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- B. Priority RIII Follow up and Closure Memo to OAC
- C. Follow up During Routine Inspection Within \_\_\_\_\_ Days and Closure Memo to OAC
- D. Discrimination
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  - 2. Reason why ADR should not be offered
  - 3. Priority for the OI investigation if ADR is not used: HIGH/NORMAL/LOW  
Recommended Basis:
- E. All other OI referrals. Priority for the OI investigation: HIGH/NORMAL/LOW  
Recommended Basis:
- F. Outside NRC's Jurisdiction. Describe Basis Below.
- G. Too General for Follow-up. Describe Basis Below.
- H. Other.

Responsible for Action - \_\_\_\_\_

II. Special Considerations/Instructions:

At the December 17, 2007 ARB -

Concern No. 5: The licensee has the CI's film badge and s/he is afraid they will overexpose it. The CI gave no basis for the concern.

Regulatory Basis: None

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- H. Other.

Responsible for Action - \_\_\_\_\_

II. Special Considerations/Instructions:

At the December 17, 2007 ARB -

Concern No. 6: Survey reports are inaccurate. The CI gave no specifics.

Regulatory Basis: 10 CFR 34.

I. Action Evaluation: The following method of resolution is recommended (circle):

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Recommended Basis:
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- H. Other.

Responsible for Action - \_\_\_\_\_

II. Special Considerations/Instructions:

At the December 17, 2007 ARB -

Concern No. 7: The cameras are stored in a travel trailer (vault). They do not set the alarm most of the time. The CI is also concerned that there is no shielding around the vault.

Regulatory Basis: Security Orders IC 2

- I. Action Evaluation: The following method of resolution is recommended (circle):
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At the December 17, 2007 ARB -