

**DBI, Inc. Quality Inspection and Consulting Services**

*Reliable...Responsive...Resourceful...Proactive*

July 7, 2011

U.S. Nuclear Regulatory Commission  
Region IV, 612 East Lamar Blvd, Suite 400  
Arlington, Texas 76011

Attention: James Thompson

Dear Mr. Thompson,

The inspection conducted on July 1, 2011 for NRC License 49-29301-01, found three violations as stated per our conversation on July 5, 2011. The following are the violations and the corrective actions taken:

1. Contrary to 10 CFR 34.41(a), the "two-man rule," requires when radiography is performed at a location other than a permanent radiographic installation, the radiographer must be accompanied by at least one other qualified radiographer or an individual who has at a minimum met the requirements of 34.43(c).
2. Contrary to 10 CFR 34.49(b), "radiation surveys", requires using a survey instrument to conduct a survey of the radiographic exposure device and the guide tube after each exposure when approaching the device or the guide tube.
3. Contrary to 10 CFR 34.46, "supervision of radiographers" assistants, requires whenever a radiographer's assistant uses radiographic exposure devices, associated equipment or sealed sources or conducts radiation surveys required by 34.49(b) to determine that the sealed source has returned to the shielded position after an exposure, the assistant shall be under the personal supervision of a radiographer.

(a) Corrective Actions:

1. Both the radiographer and assistant radiographer have been suspended from performing any radiography until both have gone through re-training on radiation safety and U.S. NRC regulations.
2. Re-training will be completed on July 14<sup>th</sup> and 15<sup>th</sup>, 2011.

Lincoln, Nebraska  
5330 N. 57<sup>th</sup> Street  
Lincoln, NE 68507  
Telephone: (402) 467-1818  
Fax: (402) 467-1766

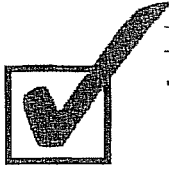
Omaha, Nebraska  
15080 A Circle  
Omaha, NE 68144  
Telephone: (402) 330-9512  
Fax: (402) 330-9540

Overland Park, Kansas  
11660 West 90<sup>th</sup>  
Overland Park, KS 66214  
Telephone: (913) 888-2321  
Fax: (913) 888-2351

Wichita, Kansas  
3707 N. Topeka Avenue  
Wichita, KS 67219  
Telephone: (316) 831-9323  
Fax: (316) 831-9323

Carter Lake, Iowa  
520 Locust  
Carter Lake, IA 51510  
Telephone: (712) 347-5295  
Fax: (712) 347-5297

Casper, Wyoming  
1909 Salt Creek Hwy.  
Casper, WY 82601  
Telephone: (307) 235-9027  
Fax: (307) 235-9082



## DBI, Inc. Quality Inspection and Consulting Services

---

*Reliable...Responsive...Resourceful...Proactive*

3. An e-mail shall be distributed to the Operation Managers and the Assistant RSO's concerning the found safety violations. The Operation Managers will distribute this e-mail to radiographic personnel and a verification sheet shall be signed and dated to be returned to the Corporate RSO by July 13<sup>th</sup>, 2011.
4. E-mail completed and distributed on July 6<sup>th</sup>, 2011.
5. An internal investigation shall be conducted to determine the root cause of why the violations occurred.
6. Internal investigation completion date will be by July 15, 2011.
7. Unannounced field audits are to be performed beyond the requirements of the U.S. NRC regulations to help ensure radiation safety is being implemented by the radiographers and assistant radiographers.
8. Initial field audits to be completed by August 31, 2011.

If there are any questions please feel free to contact me at (402) 467-1818 or [pfrye@dbindt.com](mailto:pfrye@dbindt.com).

Sincerely,

Pennie Frye  
Corporate Radiation Safety Officer

DBI, Inc.  
5330 N. 57<sup>th</sup> Street  
Lincoln, NE 68507

Lincoln, Nebraska  
5330 N. 57<sup>th</sup> Street  
Lincoln, NE 68507  
Telephone: (402) 467-1818  
Fax: (402) 467-1766

Omaha, Nebraska  
15080 A Circle  
Omaha, NE 68144  
Telephone: (402) 330-9612  
Fax: (402) 330-9640

Overland Park, Kansas  
11660 West 90<sup>th</sup>  
Overland Park, KS 66214  
Telephone: (913) 888-2321  
Fax: (913) 888-2351

Wichita, Kansas  
3707 N. Topeka Avenue  
Wichita, KS 67219  
Telephone: (316) 831-9323  
Fax: (316) 631-9323

Carter Lake, Iowa  
520 Locust  
Carter Lake, IA 51510  
Telephone: (712) 347-5296  
Fax: (712) 347-5297

Casper, Wyoming  
1909 Sall Creek Hwy.  
Casper, WY 82601  
Telephone: (307) 235-9027  
Fax: (307) 235-9082