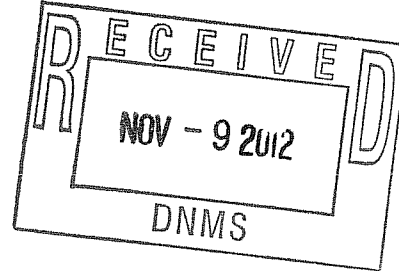


## DBI, Inc. Quality Inspection and Consulting Services

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

November 8, 2012

U.S. Nuclear Regulatory Commission  
Region IV  
Director, Division of Nuclear Materials Safety  
1600 Lamar Blvd.  
Arlington, TX 76011-4511



Attention: Region IV Director  
Division of Nuclear Materials Safety

Dear Region IV Director,

As per the Confirmatory Order for DBI, Inc. holder of License No. 49-29301-01, Docket No. 030-37817, EA-12-058, DBI has enclosed the training outline from Lamco & Associate, as identified in Condition A.3, along with the company policy statement by management to the employees.

The Civil Penalty of \$3,500.00 has been paid in accordance with NUREG/BR-0254 by method of check and sent by Federal Express overnight on this day of November 8, 2012 to U.S. Bank Government Lockbox in St. Louis, MO.

Sincerely,

Pennie Frye  
Corporate Radiation Safety Officer

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

Enclosure

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# LAMCO & ASSOCIATE



Phone: 936 271-1487

Fax : 936 271-1907

**SENSITIVE MATERIAL WITH HOLD FROM PUBLIC DISCLOSURE**

## **SAFETY CULTURE TRAINING OUTLINE FOR DBI**

**TIMELINE: 8 HOURS**

**THE TRAINING IS A CLASSROOM TRAINING WITH A POWERPOINT PRESENTATION**

- I. SAFETY CULTURE ( estimated time 45 minutes)**
  - A. Explain what a safety culture is?**
  - B. Review NRC Safety Culture Brochure**
  - C. Discuss ways to incorporate a safety culture into DBI's safety program**
  
- II. LEADERSHIP VALUES (estimated time 45 minutes)**
  - A. Problem Identification**
  - B. Your role as a leader**
  - C. Audits/watchful eye**
  - D. Role model/ Lead by example**
  - E. Set & enforce policies**
  - F. Communicate your expectations**
  
- III. WILLFUL (estimated time 45 minutes)**
  - A. Elements of willful**
    - 1. Intentional or deliberate**
    - 2. Careless disregard**
  - B. 10 CFR 30.10**
  - C. Examples of willful violations**
  - D. Business case history of willful acts**
  
- IV. DEVELOPING A SAFETY CULTURE FOR DBI (estimated time 30 minutes)**
  - A. Safety Culture values for DBI**
  - B. Enforcing safety values**
  - C. Mission statement**
  
- V. CAUSE EVALUATION (estimated 45 minutes)**
  - A. Performing Investigation**
  - B. Determining cause & root cause analysis**
  - C. Applying corrective actions**
  - D. Ensuring corrective actions are followed**
  - E. Reporting requirements**

## **SENSITIVE MATERIAL WITH HOLD FROM PUBLIC DISCLOSURE**

### **VI. PUNISHMENT (estimated 45 minutes)**

- A. Review 10 CFR 30.10**
- B. Company punishment for supervisors/employees**
- C. NRC Sanctions against company/employees**
- D. Review past enforcement actions**
- E. Discuss judicial sanctions**

### **VII. ETHICS & MORALS IN THE WORKPLACE (estimated 45 minutes)**

- A. Definition of ethics vs morals**
- B. Discuss careless disregard**
- C. Explain Integrity**
- D. Deliberate misconduct**
- E. Taking responsibility**

### **VIII. INFORMATION (estimated 30 minutes)**

- A. Accurate & factual information**
- B. Investigate & question to ensure accurate information**
- C. Gather & Report complete information**
  - 1. Follow up with regulatory agency**
  - 2. Communicate any and all facts**

### **IX. WORK ENVIRONMENT (estimated 30 minutes)**

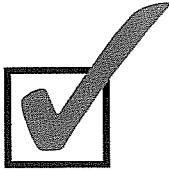
- A. Provide a professional & hostile free work environment**
- B. Punishment free environment for voicing safety concern**
- C. Open Door Policy**
- D. Communication**

### **X. PAST INCIDENTS & ACCIDENTS (estimated 30 minutes)**

- A. Human Factors**
- B. Lack of Leadership**
- C. Past accidents in industrial radiography**
- D. Accidents in other industries that were due to human error or disregard**

### **XI. OPEN DISCUSSION (estimated 30 minutes)**

- A. Questions & Answers**
- B. Exam**



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

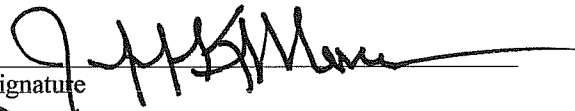
*Reliable...Responsive...Resourceful...Proactive*

**DBI Incorporated  
Radiation Safety Commitment**

**STATEMENT OF AUTHORITY**

DBI Incorporated's management and employees recognizes the necessity for a comprehensive Radiation Safety Program for Industrial Radiography. This includes, but is not limited to, the Operating, Safety, and Emergency Procedures applicable to the services it performs. DBI's management underscores the importance of maintaining the security of the radiation sources that we have in our possession and emphasizes the importance of complying with all regulatory requirements for the safety of our employees, customers and the general public. The primary authority for overall implementation and administration of the radiation safety program rests with the president of DBI Incorporated. He may delegate operational authority and responsibility to the Radiation Safety Consultant and appoint Radiation Safety Officers for the licenses issued to the organization.

The Radiation Safety Officer named on the appropriate Radioactive Materials license is assigned the responsibility and authority to enforce the requirements of this procedure. DBI's management believes that deliberate violations of our Radiation Safety policies and procedures are unacceptable, and will result in strict disciplinary actions. The President, Consultant and Radiation Safety Officers have the full support of the management of DBI incorporated.

  
Signature

11-1-2012  
Date Signed

President / CEO  
Title

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