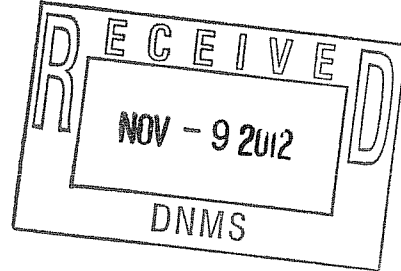


DBI, Inc. Quality Inspection and Consulting Services

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. 57th Street
Lincoln, NE 68507

Enclosure

Lincoln, Nebraska
5330 N. 57th 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
8853 Lenexa Drive
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

Council Bluffs, Iowa
1001 West Broadway
Council Bluffs, IA 51501
Telephone: (712) 347-5296
Fax: (712) 347-5287

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



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

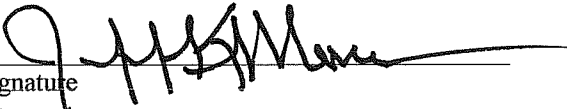
Reliable...Responsive...Resourceful...Proactive

**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

Lincoln, Nebraska
5330 N. 57th Street
Lincoln, NE 68507
Phone: (402) 467-1818
Fax: (402) 467-1766

Omaha, Nebraska
2211 S. 156th Circle
Omaha, NE 68130
Phone: (402) 330-9612
Fax: (402) 330-9640

Overland Park, Kansas
8853 Lenexa Dr.
Overland Park, KS 66214
Phone: (913) 888-2321
Fax: (913) 888-2351

Council Bluffs, Iowa
1001 W. Broadway
Council Bluffs, IA 51501
Phone: (712) 256-7875
Fax: (712) 256-7885

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

Wichita, Kansas
3707 N. Topeka
Wichita, KS 67219
Phone: (316) 831-9323
Fax: (316) 831-9326