



DBI, Inc. Quality Inspection and Consulting Services

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

November 9, 2012

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DNMS

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 outlines from Lamco & Associate, as identified in Condition A.3.

DBI, Inc. has reviewed and approved the proposed outlines by Lamco & Associate.

Sincerely,

Pennie Frye
Corporate Radiation Safety Officer

DBI, Inc.
5330 N. 57th Street
Lincoln, NE 68507

Enclosure



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

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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**

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**TRAINING OUTLINE FOR DBI CURRENT EMPLOYEE'S
THE TRAINING IS A CLASSROOM TRAINING WITH A POWERPOINT PRESENTATION**

I. DEFINITION OF SAFETY CULTURE (estimated 30 minutes)

- A. Review NRC's Safety Culture Brochure**
- B. Discuss the ways a safety culture is beneficial to the employee's**
- C. Safety & Security.**

II. WILLFUL

- A. Elements of willfulness**
- B. Review chapter 6 of NRC Enforcement Manual**
- C. Careless Disregard**
- D. 10 CFR 30.10**
- E. Deliberate Misconduct**

III. EMPLOYEE PARTICIPATION & ATTENTION TO SAFETY

- A. Individual Involvement**
 - 1. Be Alert/ Attention**
 - 2. Attitude**
 - 3. Safety conscious work environment**
 - 4. Freedom to raise safety concern**
 - 5. Ask questions**
- B. Management Roles & Responsibilities**
 - 1. Open Door Policy**
 - 2. Freedom for employee's to voice concern**
 - 3. Leadership**

C. Employee Protection

- 1. Right to report safety concerns**
- 2. Hostile-free work environment**

IV. PUNISHMENT

- A. Potential Enforcement Actions**
 - 1. Company punishment**
 - 2. NRC past enforcement actions**
 - 3. Radiography accidents**

SENSITIVE MATERIAL WITH HOLD FROM PUBLIC DISCLOSURE

V. INFORMATION

- A. Complete & Accurate information**
- B. Morals**
- C. Ethics**
- D. Communication**

VI. PROCEDURES

- A. Company procedures**
- B. Regulatory rules & requirements**

VII. Radiological Surveys

- A. Performing surveys safe lives/ including yours**
- B. Proper methods to perform surveys**
- C. Past radiological accidents**

VIII. TEAMWORK

- A. Legal crews**
 - 1. Stay informed, who can work with whom (radiographer/instructors/assistants)**
 - 2. Responsibilities of a radiographer Instructor**
 - 3. Responsibilities of a radiographer**
- B. Make the commitment**
 - 1. Follow the rules for your safety & the safety of others**
 - 2. Don't take risk**
 - 3. Report unsafe acts**

IX. OPEN DISCUSSION

- A. Questions and Answers**
- B. Quiz**