

Craffey, Ryan

From: Schultz, Matthew <MSCHULTZ@WadeTrim.com>
Sent: Tuesday, May 14, 2013 11:26 AM
To: Craffey, Ryan
Cc: Brinks, Christopher
Subject: RE: NRC Inspection - Corrective Actions
Attachments: RadiationSafetyManual.pdf

Ryan,

I have revised the Transportation procedures in our Radiation Safety Manual to clarify the two barriers requirement as we spoke about earlier and have attached the section for your review. I am also including the Utilization section, Emergency procedures section, Use of Radioactive materials section, and our Emergency Procedures Instructions from our Radiation Safety Manual as examples of what is discussed during our training concerning transportation and operation of the gauges.

I hope this information helps to clarify our in house training.

Thanks again,

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From: Craffey, Ryan [mailto:Ryan.Craffey@nrc.gov]
Sent: Tuesday, May 14, 2013 9:02 AM
To: Schultz, Matthew
Subject: RE: NRC Inspection - Corrective Actions

Hi Matt, any luck with those training materials? Anything that shows how you refresh the inspectors on relevant transportation topics should work.

From: Schultz, Matthew [mailto:MSCHULTZ@WadeTrim.com]
Sent: Sunday, April 28, 2013 11:36 AM
To: Craffey, Ryan
Cc: Brinks, Christopher
Subject: RE: NRC Inspection - Corrective Actions

Mr. Craffey,

I apologize for the delay in my response.

As we discussed during your follow up, I have already addressed your findings in connection with transportation. Going forward, I will revise the current Wade Trim Radiation Safety Guide to reflect the two barriers requirement more clearly. I plan on implementing these revisions by no later than May 10th and will forward you a copy of those revisions. I have already discussed these issues with our other gauge operators to clarify the transportation requirements.

As with the revisions, I am planning on completing our next audit before May 10th.

Again, as we discussed during your inspection, I do cover transportation of the gauges in our yearly Inspector Training. In reviewing the attached DOT Hazmat training requirements, our yearly Inspector Training covers all of the training requirements contained therein except the recordkeeping. Looking forward, I will be in contact with my Supervisor about the possibility of utilizing an outside source to perform our Hazmat Transportation Training. I have had contact with Cline's Technical Service in Amanda, Ohio and plan to inquire about training through Great Lakes Safety in Midland, Michigan to see if they offer relevant training.

I greatly appreciate the opportunity to address your findings. I look forward to speaking with you again on Monday.

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From: Craffey, Ryan [<mailto:Ryan.Craffey@nrc.gov>]
Sent: Thursday, April 18, 2013 8:55 PM
To: Schultz, Matthew
Subject: NRC Inspection - Corrective Actions

Good evening Matt,

Thanks for your time this week. As we move forward, if we could get any of the following documented up front, it would really help us out going into the review process.

Security of portable gauges - 10 CFR 30.34(i)

- A copy of your revision to the operating procedure for transportation, or a date when you plan to revise the procedure
- How and/or when you plan to discuss the requirement with other users to ensure that they are transporting gauges with two barriers
- If other gauge users transport the gauges in a different manner, could you describe how they do so?

Annual audits – 10 CFR 20.1101(c)

- A copy of your next audit, or a date when you plan to conduct the next audit

Hazmat Refresher Training – 49 CFR 172.704(c)(2)

- If you do address hazardous materials transportation during annual refresher training, a list of relevant topics that you cover
- If you do require additional training to meet the requirements in 49 CFR 172.704, your plan for conducting this training.

Here's a link to the DOT Hazmat training requirements, for your reference:

<http://www.ecfr.gov/cgi/t/text/text->

[idx?c=ecfr&SID=e4f1c7275bb8fe0c4c98960276546b2d&rqn=div8&view=text&node=49:2.1.1.3.8.8.25.4&idno=49](http://www.ecfr.gov/cgi/t/text/text-idx?c=ecfr&SID=e4f1c7275bb8fe0c4c98960276546b2d&rqn=div8&view=text&node=49:2.1.1.3.8.8.25.4&idno=49)

Let me know if you have any questions, and thanks again!

Ryan Craffey

Health Physicist

US Nuclear Regulatory Commission

Materials Inspection Branch, Region III

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3.0 Operating Procedures – Transportation

It is the responsibility of any person transporting a nuclear gauge to ensure that proper precautions are taken to prevent damage to and theft of the gauge.

- A. Packaging – Gauge should be secured in its case. The case should be checked before loading for damage to both the case itself and all labeling. Any damage found should be reported to your Supervisor or the Radiation Safety Officer immediately.

- B. Transportation – Gauge should be secured in its case to the vehicle in two places. Acceptably secured areas by vehicle type are as follows:
 - 1. Van / SUV / Station Wagon – The gauge should be secured in its case by no less than two chains and two locks to the vehicle in the rear (cargo area) with the vehicle being locked at all times when the Operator is not present.

 - 2. Pickup – The gauge should be secured in its case by no less than two chains and two locks to the vehicle in the bed of the vehicle.

 - 3. Car – The gauge should be secured in its case to the vehicle by no less than one chain and one lock with the trunk locked.

- C. Shipping Papers – A minimum of the Bill of Lading, Materials License, most recent leak test results, and source certificate must be carried when transporting a gauge with the Bill of Lading displayed in the driving compartment of the transporting vehicle. The current Bill of Lading can be found in Appendix B.