

## **Thompson, James**

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**From:** Thompson, James  
**Sent:** Monday, March 14, 2016 1:45 PM  
**To:** 'abuehrle@usgs.gov'  
**Cc:** 'jbpaces@usgs.gov'  
**Subject:** USGS License #05-01399-08: Report of Two Separate Violations

**Importance:** High

Mr. Buehrle:

Thank you for informing us about these self-identified violations at the USGS facility in Denver, CO. The NRC's Enforcement Policy allows our Agency to consider certain violations as non-cited violations (NCV), as long as they meet certain criteria. It appears that since you corrected these violations, which would normally be categorized as Severity Level IV violations, that we can consider them non-cited.

These issues will be reviewed during the next routine inspection of your facility; please keep a copy of your documentation of corrective actions available for inspection at a later date. Thank you again for the diligence that your facility has demonstrated in keeping a good radiation safety program in place, and proactively identifying and correcting potential non-compliances.

James L. Thompson  
Senior Health Physicist  
U.S. NRC, Region IV  
Arlington, Texas

## Thompson, James

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**To:** Cook, Jackie  
**Subject:** USGS License #05-01399-08: Report of Two Separate Violations  
**Attachments:** NRC Violation Report March 2016 - Inventory - Signed.pdf; NRC & DOT Violation Report March 2016 - signed.pdf

**From:** Buehrle, Alex [<mailto:abuehrle@usgs.gov>]  
**Sent:** Friday, March 11, 2016 3:27 PM  
**To:** Cook, Jackie <[Jackie.Cook@nrc.gov](mailto:Jackie.Cook@nrc.gov)>  
**Cc:** James Paces <[jbpaces@usgs.gov](mailto:jbpaces@usgs.gov)>  
**Subject:** [External\_Sender] USGS License #05-01399-08: Report of Two Separate Violations

Dear Miss Cook,

I am reporting two violations of the USGS License of Broad Scope, license #05-01399-08. Attached to this email are the violation notifications. I am also sending you hard copies of these documents through FedEx.

Thank you,  
Alex Buehrle, CHP  
Radiation Safety Officer  
United States Geological Survey  
Bureau Safety Management Branch

Denver Federal Center  
Post Office Box 25046  
Building 810, Mail Stop 205  
Denver, CO 80225-0046

Office: 303-236-9173  
Cell: 720-390-1510  
Fax: 303-236-5963



Department of the Interior  
US Geological Survey  
Box 25046 MS-205  
Denver CO, 80225

March 10, 2016

U.S. NRC Region IV  
1600 East Lamar Boulevard  
Arlington, Texas 76011-4511

Dear Sir or Madame,

The U.S. Geological Survey (USGS) would like to self-report a recently-discovered violation of the conditions of our License of Broad Scope, license #05-01399-08.

1. The USGS has been in violation of License Condition 25 requiring a semi-annual physical inventory of all sources and/or devices under the license. There have been two specific violations of this License Condition.
  - a. The first violation is that radioactive waste under the license has not been reported on the inventories and has not been checked against licensed limits. All items not inventoried total less than 187 mCi.
  - b. The second violation is that all radioactive waste storage locations have not had a semi-annual physical inventory as required.

Both of these violations were corrected during the November 2015 semi-annual inventory. The radioactive waste under the license was added to the inventory and no license limits were exceeded. No loss of radioactive material has been noted. To prevent re-occurrence users under the license will be notified of the requirement to include radioactive waste during their semi-annual physical inventory.

Please contact me or Jim Paces (USGS Radiation Safety Committee Chairperson) if you have any questions about this self-reported violation.

Sincerely,

A handwritten signature in black ink that reads "Alex Buehrle". The signature is written in a cursive, flowing style.

Alex Buehrle  
USGS Radiation Safety Officer  
303-236-9173  
abuehrle@usgs.gov



Department of the Interior  
US Geological Survey  
Box 25046 MS-205  
Denver CO, 80225

March 10, 2016

U.S. NRC Region IV  
1600 East Lamar Boulevard  
Arlington, Texas 76011-4511

Dear Sir or Madame,

The U.S. Geological Survey (USGS) would like to self-report a recently-discovered violation of the conditions of our License of Broad Scope, license #05-01399-08, 10 CFR 71, and 49 CFR 172.

1. Well-loggers located in Idaho Falls, ID have been shipping sealed radioactive well-logging sources to conduct their operations. These users received the initial required training for shipping Dangerous Goods – Class 7 Radioactive Materials. However, the required recurrent training was not completed as described in 49 CFR Subpart H. This is a violation of our License of Broad Scope Condition 29, 10 CFR 71.5(a)(1)(vi), and 49 CFR 172. The users have been notified of the recurrent training requirement and were successfully retrained in November 2015. The U.S. Geological Survey was in violation of Condition 29, 10 CFR 71.5(a)(1)(vi), and 49 CFR 172 from November 2010 through November 2015. There is no indication that shipments were completed improperly during this time frame. All shipments were made within the state of Idaho. To prevent re-occurrence users under the license will be notified of the training requirements for shipping Dangerous Goods - Class 7 Radioactive Materials. Also, the USGS Radiation Safety Officer will begin tracking the 49 CFR training and retraining requirements.

This self-reported violation will be reported to the U.S. Department of Transportation.

Please contact me or Jim Paces (USGS Radiation Safety Committee Chairperson) if you have any questions about this self-reported violation.

Sincerely,

A handwritten signature in black ink that reads "Alex Buehrle". The signature is written in a cursive, flowing style.

Alex Buehrle  
USGS Radiation Safety Officer  
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abuehrle@usgs.gov