



OFFICE OF THE
GENERAL COUNSEL

DOCKET NUMBER
BYPRODUCTS 30-31373-CIVP
UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DOCKETED
USNRC

September 8, 1998

'98 SEP 10 A10:51

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Charles Bechhoefer, Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Richard F. Cole
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Charles N. Kelber
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
Conam Inspection, Inc. (License No. 12-16559-01)
Itasca, Illinois, 60143
(Order Imposing Civil Monetary Penalty)
Docket No. 30-3137-Civ.P.

Dear Administrative Judges:

The Board's Order of August 31, 1998 requires that professional qualifications of prospective witnesses be in the Board's possession by Wednesday, September 9, 1998. Attached are professional resumes for Staff proposed witnesses: Thomas F. Young, William Geoffrey West, Monte P. Phillips, Nader Leon Mamish, and Donald A. Cool.

Also in its Order of August 31, 1998, the Board requested a list of documents. Attached hereto is a list of documents that the Staff may introduce. The list also includes documents upon which the Board has indicated interest. The evidentiary value of the documents and their admissibility will be resolved at the hearing. The Staff has not been able to arrive at a joint document list with Conam, not through actual disagreement but largely due to the press of time, and therefore the Staff has provided the attached Staff list.

Sincerely,
Charles A. Barth
Charles A. Barth
Counsel for NRC Staff

Attachment: As stated

cc w/att.: Service List

SECY-EHD-001

DS03

19501

RESUME

Donald A. Cool, Ph.D.

DIRECTOR, DIVISION OF INDUSTRIAL & MEDICAL NUCLEAR SAFETY
OFFICE OF NUCLEAR MATERIAL SAFETY & SAFEGUARDS
UNITED STATES NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Education: BS 1978 Biology Houghton College
MS 1981 Radiation Biology University of Rochester
Ph.D. 1983 Radiation Biology University of Rochester

Experience: 1995 - Present

Director, Division of Industrial and Medical Nuclear Safety, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission. Responsible for oversight of the NRC program of licensing and inspection of nuclear materials in areas other than nuclear power reactors and fuel cycle facilities. Program responsibilities also include radiation protection technical and policy reviews, incident and event response and followup, allegation and enforcement coordination for the Office, and oversight and review of the regionalized licensing and inspection program for byproduct materials..

1989 - 1995

Branch Chief, Radiation Protection and Health Effects Branch, Office of Nuclear Regulatory Research, U.S. Nuclear Regulatory Commission. Responsible for research, technical assistance, regulation and guidance development related to radiation protection, including the revision of 10 CFR Part 20; source, byproduct and special nuclear material licensing; decommissioning criteria and procedures; and exemptions from regulatory control including potentials for recycle and reuse of materials.

1987 - 1989

Section Leader, Programmatic Safety Section, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission. Responsible for coordination of radiation protection standards within office; inspection policy and manual development; and support for licensing and emergency response activities.

1982 - 1987

Health Physicist, Fuel Cycle Safety Branch, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission. Responsible for health physics and environmental reviews for licensing of fuel cycle facilities and decommissioning activities. Responsible for special projects including uranium mill tailings standards, and uranium exemptions. Served rotational assignment to Office of Science and Technology Policy, Executive Office of the President.

- Activities:**
- Member, International Commission on Radiological Protection (ICRP) Committee 4 for 1993-1997
 - U.S. representative to the International Atomic Energy Agency Radiation Safety Standards Advisory Committee, 1996 - 1999
 - NRC representative to Nuclear Energy Agency Committee on Radiation Protection and Public Health
 - NRC representative, Executive Office of the President, Committee on Inter-agency Radiation Research and Policy Coordination Science Panel
 - Chairman, CIRRPC Policy Subpanel on Radiation Protection Recommendations
 - Member, ICRP Committee 4 Task Group on Waste Disposal, resulting in ICRP Publication 46
 - Consultant and US representative, International Atomic Energy Agency (IAEA) Advisory Groups on Potential Exposure (SS 104)
 - Member, ICRP Committee 4 Task Groups on Potential Exposure, resulting in ICRP Publications 64 and 76
 - US representative, IAEA Advisory Groups on Recycle/Reuse of Materials
 - US representative, IAEA Advisory Groups on Exemption of Biomedical Waste
 - US representative and senior expert, IAEA International Basic Safety Standards, Safety Series 115

Societies: Health Physics Society
Sigma Xi

Publication Areas: Retention and excretion of radionuclides
Internal Dosimetry calculations and models
Policy on exemption from regulatory control
Radiation Protection Standards policy, requirements and activities
Byproduct materials program and implementation

Areas of Competence: Public Policy
Radiation Standards
Health Physics
Radiobiology
Environment and Decommissioning
Licensing and Inspection of Nuclear Materials

RESUMÉ

NADER LEON MAMISH

UNITED STATES NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Education

University of Lowell, Lowell, Massachusetts.

1987-89 Master of Science in Radiological Sciences and Protection, June 1989.

1982-87 Bachelor of Science in Radiological Health Physics, May 1987.

Work Experience

1992-present, U. S. Nuclear Regulatory Commission, Washington, D.C.

1993-present, NRC Headquarters, "Senior Enforcement Specialist"

As a senior enforcement specialist, I assist the Director, Office of Enforcement (OE), in evaluating and improving the effectiveness of enforcement programs and perform in-depth analysis of policy issues and regulatory programs concerning enforcement in the area of health physics. In addition, I review and revise (or prepare when necessary) proposed escalated enforcement actions to ensure technical accuracy, factual content, and conformance to Federal regulations and established enforcement policy. In performing such duties, I coordinate and track enforcement actions with other affected offices and, if necessary, resolve any disagreements in a timely manner. My accomplishments to date are as follows:

- *Reviewed and revised approximately 150 escalated enforcement actions taken against NRC licensees;*
- *Prepared numerous clear, concise, and logical Commission papers, policy statements, escalated enforcement actions, Executive Director for Operation (EDO) items, and other written documents related to enforcement;*
- *Analyzed about 40 investigation reports and other documents issued by the Office of Investigations for potential enforcement actions;*
- *Performed numerous special projects such as preparation of enforcement guidance memoranda and responses to congressional requests.*

1992-93, NRC Region V, "Radiation Specialist"

As a radiation specialist (health physics inspector), I assisted the Chief, Facilities Radiological Protection Branch, in enhancing and implementing the inspection program. In executing these duties, I performed well-planned, well-organized, independent inspections at nuclear power plants

and fuel fabrication facilities, and routinely interfaced with licensee management to present inspection findings related to safety and non-compliance issues. Other duties included performance of inspector support activities such as routine participation in emergency response teams as a health physics specialist, support and assistance in coordination and performance of chemistry team inspections, and preparation of accurate input to Systematic Assessment of Licensee Performance (SALP) reports. My achievements were as follows:

- Identified significant safety violations that resulted in an escalated enforcement action;
- Routinely prepared timely, concise inspection reports documenting inspection findings and developed appropriate enforcement actions;
- Provided technical support activities related to health physics and radiochemistry, and reviewed proposed NRC rules and regulations for technical adequacy.

1988-92, Florida Power and Light Company, Miami, Florida.

1989-92, Turkey Point Nuclear Plant, "Operations Engineer - Plant Engineer I"

As a health physics operations engineer, I assisted the Supervisor of Operations, Health Physics, in evaluating the radiological conditions of both nuclear units and provided appropriate recommendations to ensure compliance with Federal regulations. Further, I was charged with supervision and maintenance of the Whole Body Counter and the Counting Room, performance of independent verification of radionuclide calculations and radiation measurements of radioactive material shipments, performance of external and skin dose assessments, and performance of self-assessment audits. My accomplishments were as follows:

- Developed and implemented a MicroVax-based Gamma Spectroscopy System which resulted in significant efficiency and tracking improvements;
- Developed and implemented a MicroVax-based Whole Body Counting System which enhanced detection sensitivity and tracking capability;
- Established a Quality Assurance System for the Whole Body Counting system and the Counting Room;
- Performed special projects such as a multi-badging study for determination of dose gradient throughout the plant which reduced dosimetry assessment costs significantly.

1988-89, Turkey Point Nuclear Plant, "Technical Support Engineer - Plant Engineer II"

As a technical support engineer, I assisted the Supervisor of Technical Support, Health Physics, in providing guidance to the health physics department. Routine duties included analysis and trending of alpha contamination throughout the Radiation Controlled Area, training health physics personnel on newly acquired instruments, enhancement/trouble shooting various health physics programs/systems, and development and revision of Health Physics procedures. My accomplishments were as follows:

- Developed a plant wide program to reduce skin/clothing contamination which resulted in a 60% reduction of such contaminations;
- Developed and implemented a PC-based fully automated counting system which improved both efficiency and tracking notably;
- Acted as project supervisor for ALARA and contamination controls of the Spent Fuel Pool Heat Exchanger inspection and modification.

1985-88, Yankee Atomic Electric Company, Framingham, Massachusetts.

1987-88, Headquarters, "Graduate Engineer"

As a graduate engineer, I supervised the daily operation of the dosimetry laboratory which provided dosimetry support for four nuclear power stations and three hospitals. Other routine duties included the accountability of liquid effluent discharges from the laboratory to sanitary sewage system and use of extrapolation chamber at nuclear power plants during outages for calculations of plant-based beta correction factors. My achievements were as follows:

- *Researched and developed an algorithm for TLD trap-fade correction factors which improved accuracy of dosimetry measurements;*
- *Translated, verified, and validated all radiation dosimetry software from HP-85 Basic to HP-IPC Basic computer languages;*
- *Developed data communication software and procedures for exchanges of client dosimetry files.*

1985-87, Headquarters, "Lead Health Physics Technician"

As a lead health physics technician, I assisted the Supervisor, Dosimetry Laboratory, in the day-to-day operation of the dosimetry laboratory. Other duties included training personnel on operation of dosimetry laboratory equipment, calibration and operation of the TLD system and various HP survey instrumentation, and leak check testing of laboratory standards.

Specialized Training/Education

During my professional career, I have attended the following classes:

- *Diagnostic & Therapeutic Nuclear Medicine, Advanced Health Education Center, 1996;*
- *Teletherapy and Brachytherapy, Mallinckrodt Medical, Inc., 1995;*
- *Industrial Radiography, Amersham Corporation, 1994;*
- *Internal & Whole Body Dosimetry, NRC Tech. Training Center, 1993;*
- *Radioactive Waste Management, NRC Tech. Training Center, 1993;*
- *Occupational Respiratory Protection, Respirator Support Services, 1993;*
- *Westinghouse PWR Technology, NRC Tech. Training Center, 1993;*
- *General Electric BWR Technology, NRC Tech. Training Center, 1992;*
- *Effective Business Writing, NRC Region V Training, 1992;*
- *Radioactive Material Packaging and Shipping, Scientific Ecology Group, Inc., 1992;*
- *Radioactive Waste Packaging, Transportation, and Disposal, Chem-Nuclear Systems, Inc., 1989;*
- *VAX/VMS System Management, Nuclear Data Systems, 1989;*
- *VAX/VMS Spectroscopy Applications Programming, Nuclear Data Systems, 1989;*
- *Technical Staff Training, Florida Power & Light, 1988;*
- *Neutron Personnel Dosimetry, Oak Ridge National Laboratory, 1986.*

Awards

High Quality Award, NRC Headquarters, 1996; Performance Award, NRC Headquarters, for outstanding performance, 1994; Letter of Commendation, NRC Region V, for outstanding support of San Onofre Chemistry Team Inspection, 1992; Quality Improvement Team of the month, November 1989, Florida Power & Light; Dean's list, University of Lowell, 1987; Tech-Ops Scholarship for academic excellence in Radiological Health Physics, 1983.

RESUME

MONTE P. PHILLIPS

UNITED STATES NUCLEAR REGULATORY COMMISSION
901 WARRENVILLE ROAD
LISLE, ILLINOIS 60532

Present Position: Chief, Materials Licensing Branch
(3/98 to present) Division of Nuclear Materials Safety, Region III
U. S. Nuclear Regulatory Commission

Prior Positions:

Allegations Coordination Staff Lead, (8/97 to 3/98)
Office of the Regional Administrator, Region III
U. S. Nuclear Regulatory Commission

Chief, Materials Inspection Branch 2, (2/96 to 8/97)
Division of Nuclear Materials Safety, Region III
U. S. Nuclear Regulatory Commission

Technical Assistant to the Division Director, (10/95 to 2/96)
Division of Nuclear Materials Safety, Region III
U. S. Nuclear Regulatory Commission

Chief, Reactor Projects Section 2B, (5/92 to 10/95)
Division of Reactor Projects, Region III
U. S. Nuclear Regulatory Commission

Chief, Operational Programs Section, (3/86 to 5/92)
Division of Reactor Safety, Region III
U. S. Nuclear Regulatory Commission

Chief, Emergency Preparedness Section, (10/83 to 3/86)
Division of Radiation Safety and Safeguards, Region III
U. S. Nuclear Regulatory Commission

Emergency Preparedness Analyst, (6/82 to 10/83)
Division of Radiation Safety and Safeguards, Region III
U. S. Nuclear Regulatory Commission

Radiation Specialist (Health Physicist), (3/80 to 6/82)
Division of Emergency Preparedness and Operational Support, Region III
U. S. Nuclear Regulatory Commission

Health Physicist, Code 105.52 (Environmental Monitoring), (9/75 to 3/80)
Radiation Health Division
Mare Island Naval Shipyard

Health Physicist, Code 105.51 (Dosimetry), (10/73 to 9/75)
Radiation Health Division
Mare Island Naval Shipyard

Education & Training:

University Studies:

University of Washington - Seattle, WA
Bachelor of Science with Distinction in Physics - 1971

University of Washington - Seattle, WA
Graduate studies in Radiological Sciences - 1971 to 1973

Mare Island Naval Shipyard:

Training courses in topics related to radiation safety, practices for working safely in contaminated radiation areas, fire fighting techniques associated with areas containing radioactive contamination, and personnel monitoring techniques.

Nuclear Regulatory Commission:

Training courses in topics related to reactor operations, reactor systems, emergency preparedness, etc. Specifically, the following courses were completed satisfactorily:

Dose protection, Accident Assessment, & Protective Action Decisionmaking

BWR Technology

Independent Measurements of Radionuclides

PWR Technology

BWR/PWR Radwaste

Fundamentals of Inspection

Radiological Emergency Response and Operations

Science, Technology, and Public Policy

B&W Overview for Technical Managers

Protective Measures/Health Physics

Systems Reliability and Analysis Techniques

PWR Series

Workshop on Core Uncovery

Probabilistic Risk Assessment

GE Nuclear Engineering

NRC and its Environment

How to do a Safety Systems Functional Inspection

Master Inspection Planning

Procurement of Replacement Nuclear Parts and Components

Accident/Incident Investigation Workshop

Revised 10 CFR Part 20

Response Technical Manual Refresher

Site Access Refresher

Health Physics Topical Review (Transportation)

GDP Supplement to the Response Technical Manual

Other non-technical courses associated with management, supervision of staff, motivation of personnel, personnel policies and practices, and ethics.

Resumé

WILLIAM GEOFFREY WEST

PROJECT ENGINEER

UNITED STATES NUCLEAR REGULATORY COMMISSION

Educational Background:

- College - University of Michigan
Master of Engineering (M. Eng.)
Radiological Health Engineering
Graduated: September, 1995.
GPA: 3.7 Dean's List / High Honors
Department of Energy Graduate Fellow
- Georgia Institute of Technology
Bachelor of Nuclear Engineering (B.N.E.)
Graduated: December, 1993.
GPA: 3.3 Dean's List / Honors
Presidential Scholar
National Merit Scholar
- High School - North Cobb High School, Kennesaw, GA.
Graduated June, 1989 - Class Salutatorian

Professional Experience:

- May, 1998 - present:
United States Nuclear Regulatory Commission
Region II Office, Atlanta, GA.
Project Engineer - Responsibilities include the coordination of inspections for three commercial nuclear power plants in the Southeast, as well as the technical assessment of issues at those plants.
- March, 1996 - May, 1998:
United States Nuclear Regulatory Commission
Region III Office, Lisle, IL.
Radiation Specialist - Responsibilities include the inspection and assessment of radiation protection and chemistry activities at nuclear power stations in the Midwest. In addition, job assignments have included inspection and regulation of nuclear materials in various types of NRC materials licensees.

June, 1995 - September, 1995:

United States Department of Energy

Yucca Mountain Project Field Office, Las Vegas, NV.

Intern Engineer - Responsibilities included various waste management and health physics analysis activities, including pathway analysis, sensitivity analysis, risk assessment, and on-site instrumentation operation for the Yucca Mountain Site Characterization Project.

July, 1994 - September, 1994:

Consort Technologies, Inc., Oak Ridge, TN.

Consulting Engineer - Responsibilities included management and health physics consulting for Martin Marietta Energy Systems at the Oak Ridge K-25 Site.

September, 1993 - July, 1994:

Consort Technologies, Inc., Atlanta, GA.

Consulting Engineer - Responsibilities included health physics and nuclear engineering consulting, specifically in the areas of radiation dosimetry, worker bioassays, and quality control procedures.

June, 1992 - September, 1992:

Lockheed Aerospace Corp., Marietta, GA.

Engineer - Responsibilities included propulsion analysis, jet engine thermodynamics and fluid flow, computer engine modeling and programming, and general design.

June, 1991 - September, 1991:

Lockheed Aerospace Corp., Marietta, GA.

Engineer - Responsibilities included structural analysis, stress and fatigue analysis, crack-growth simulation, extensive static modeling, and computer simulation/programming.

September, 1989 - November, 1990:

Georgia Tech Research Institute., Atlanta, GA.

Student Assistant/Programmer - Worked on various military contracts involving computer programming, computer-aided design (CAD), and electronic hardware simulation and analysis (HDL). Projects included the MACS Army Artillery Simulation and the LHX Army Advanced Helicopter Project.

Organizations/Activities:

American Nuclear Society - Member

Health Physics Society - Member

Gamma Beta Phi - Nuclear Engineering Honor Society - Member

Golden Key National Honor Society - Member

Tau Beta Pi - National Engineering Honor Society - Member

MENSA - Member

RESUME'

THOMAS F. YOUNG

UNITED STATES NUCLEAR REGULATORY COMMISSION
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532

Present Position: Radiation Specialist
(6 years) U.S. Nuclear Regulatory Commission
Region III, Division of Nuclear Materials Safety
Materials Inspection Branch 2

Prior Positions:

- ▶ Assistant Radiation Safety Officer, 1988-1992
University of Missouri
Columbia, Missouri
- ▶ Radiological Physicist, 1986-88
Radiation Consultants of Mid-America
Shawnee-Mission, Kansas
- ▶ Radiation Safety Officer, 1978-86
University of Nebraska Medical Center
Omaha, Nebraska
- ▶ Radiation Specialist I, II, and III, 1974-78
Nebraska Department of Health
Lincoln, Nebraska
- ▶ Health Physics Technician, 1971-74
University of Nebraska
Lincoln, Nebraska

Education and Training:

- ▶ University of Nebraska-Lincoln
Bachelor of Science (Zoology), 1974
- ▶ University of Nebraska Medical Center
Graduate Studies (Medical Sciences-Radiology)
- ▶ Oak Ridge Associated Universities
Ten Week Course in Health Physics and
Radiation Protection, 1977

- ▶ Nuclear Regulatory Commission
Training courses in topics related to licensing and inspection of medical, industrial, and commercial uses of byproduct material; and radiological emergency response. Most recent training has included:

- Radiation Specialist Certification Program
(Materials Inspector)
- Fundamentals of Inspection
- In-place Filter Testing
- Site Access
- Industrial Radiography
- Nuclear Gauge Safety
- Transportation of Radioactive Materials
- Revised 10 CFR 20
- EPA Notice Regarding Subpart I to 40 CFR 61
- Root Cause/Incident Investigation
- Fetal Radiation Dose Assessment
- Air Sampling
- Inspecting for Performance (Materials)
- Health Physics Technology
- Internal Dosimetry and Whole Body Counting
- OSHA Collateral Duty Course
- Health Physics Topical Reviews
 - Teletherapy/ Brachytherapy
 - Transportation
- Teletherapy and Brachytherapy
- Diagnostic and Therapeutic Nuclear Medicine
- Safety Aspects of Well Logging

NRC STAFF PROPOSED EXHIBITS
CONAM INSPECTION, Inc. vs NRC

1. Conam Inspection Materials License, 12-16559-01, Amendment No. 6, eight pages
2. Report of Interview with Randy Sweet, September 11, 1996 by Richard Anderson, Special Agent, Office of Investigations, NRC
3. Report of Interview with Robert J. Slack, September 12, 1996 by Richard Anderson, Special Agent, Office of Investigations, NRC
4. Conam Procedure, Personnel Monitoring Requirements, March 29, 1993, page 7.
5. Report of Interview with William J. Chastain, September 9, 1998, by Richard T. Anderson, Special Agent, Office of Investigations.
6. Conam Procedure. Technical Operations Model 533, 660, Capacity 100 Curies, pages 25,26, and 27.
7. Conam's Checklist For Incident Report, Individuals Involved, William Chastain/ Arnie Tucker, dated February 27, 1996, five pages, includes Chastain's handwritten report and a diagram of the room at Lilly where the incident occurred.
8. Memo, R.J.Slack re Radiation Incident, dated February 29, 1996, two pages
9. Conam Procedure, Personnel Training and Qualification Requirements, Conam RSAM 03-26-93, pages 4, 5 and 6
10. Conam Dose Reconstruction, Tom Young/Geoff West, NRC, April 19, 1996. Includes diagram of Chastain on the ladder and the ladder with the camera
11. Conam Inspection Inc Dose Reconstruction Data, by NRC. Faxed to Robert Slack April 19, 1996
12. Letter, Goeffrey C. Wright, NRC to Michael B. Creach, Conam, dated May 14, 1996, "Satisfaction of Confirmatory Action Letter Dated April 5, 1996". Includes:, Robert Slack, Conam, to Thomas Young, NRC, dated April 17, responding to NRC's Confirmatory Action Letter
13. Letter to Michael Creech, Conam dated November 18, 1996 from Cythia D. Pederson, NRC, inclosing Inspection Report No. 030-31373/96002 (DNMS)

14. Letter to Robert Slack, Conam dated December 10, 1996, from Carol D. Berger, IEM, inclosing assessments of the dose Mr. Chastain received.
15. Letter to Michael Creech, Conam dated March 19, 1997, from James Lieberman, NRC, Demand For Information
16. Letter to James Lieberman, NRC, dated April 9, 1997 from Clifton A. Lake, counsel for Conam responding to NRC's Demand for Information
17. Letter to Michael Creech, Conam, dated June 10, 1997 from A. Bill Beech, NRC, Notice of Violation and Proposed Imposition of Civil Penalty-\$16,000.00.
18. Letter from Clifton A. Lake, Conam's counsel, dated July 7, 1997 to James Lieberman, NRC Conam's Reply and Answer to NRC's Proposed Notice of Violation.
19. Letter to Michael Creech, Conam, dated November 5, 1997 from James Lieberman, NRC, Order Imposing Civil Monetary Penalty-\$16,000.00
20. Letter to Director, Office of Enforcement, NRC, dated December 1, 1997 from Clifton A. Lake, counsel for Conam, requesting a hearing.
21. Color photo 8 X 10 inches of room where incident occurred. In exhibit 23, the ladder is larger than in exhibit 24 and the glass in the entry door is visible.
22. Color phot 8 X 10 inches of room where incident occurred. In exhibit 24 the ladder is smaller than in exhibit 23
23. Arnold W. Morrill Response To Requests For Admissions, dated June 2, 1998 to the effect that the room in which pictures Joint Exhibits 23 and 24 were taken was not disturbed between the incident and the taking of the photographs by Mr. Morrill
24. HPS N13.41-1997, An American National Standard- Criteria for Performing Multiple Dosimetry, approved December 1996
25. Amertesttm gamma radiography products Model 660 gamma ray projector, Amersham 3/91
26. Radiation Protection ICRP PUBLICATION 26, January 17, 1977.
27. Escalated Action Process, NRC diagram of the enforcement process. This may be found on Internet www@nrc.gov/oe/ and is on pages xxix and 25 of the Enforcement Manuel.

28. NUREG-1600, General Statement of policy and Procedures for NRC Enforcement Actions, July 1995