

LICENSE NO: 37-20584-01

DET NO. (s) 030-19945

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ATTACHED

- Appendix A
- Appendix B
- Appendix C
- Memo

INSPECTION REPORT NO. 83-01

Valley Forge Laboratories, Inc.

6 Berkeley Road

Devon, PA 19333

LICENSEE CONTACT: Richard H. Miller (President)

Telephone No: (215) 688-8517

LICENSE NO: 37-20584-01

CATEGORY E PRIORITY: 3

CATEGORY \_\_\_\_\_ PRIORITY: \_\_\_\_\_

CATEGORY \_\_\_\_\_ PRIORITY: \_\_\_\_\_

INSPECTION DATE (s): 4/28/83

- TYPE OF INSPECTION:
- SPECIAL
  - ROUTINE
  - DAYSHIFT
  - OTHER (initial)
  - ANNOUNCED
  - UNANNOUNCED

SUMMARY OF FINDINGS AND ACTION

- NO NONCOMPLIANCE, CLEAR 591 ISSUED
- NO NONCOMPLIANCE, LETTER
- NONCOMPLIANCE, APPENDIX A

- ACTION ON PREVIOUS NONCOMPLIANCE, APPENDIX B
- NONCOMPLIANCE, 591 ISSUED
- SUPPLEMENTAL INFO, APPENDIX C

RECOMMENDATIONS  
SEE BASIS IN APPENDIX C

- CHANGE CATEGORY TO: \_\_\_\_\_
- NEXT INSPECTION DATE: \_\_\_\_\_

- CHANGE PRIORITY TO: \_\_\_\_\_

PERSONS CONTACTED

Richard Miller, Sr. (President)

Dave Blackmore, RSO

INSPECTOR: Mike Varela

John Glenn

APPROVED: \_\_\_\_\_

John E. [Signature] 4/28/83

INSPECTION PLAN AND REPORT NUMBER \_\_\_\_\_ Page \_\_\_\_\_ of \_\_\_\_\_

Plan Approved: \_\_\_\_\_ Date: \_\_\_\_\_

Licensee: \_\_\_\_\_ License No. \_\_\_\_\_

Inspection Items	Scheduled for Inspection	Post Inspection Status	Module No.
Management Meeting - Entrance and Exit Interviews (Required)	✓	Done	30703B
Program Requirements, MC 2850 (Required)	✓	Done	77710B
Followup on Noncompliance and Deviations	N/A	N/A	92702B
Independent Inspection Effort (Required)	✓	Done	92706B
Transportation	✓	Done 1/2 hr	86740B

NRC-3 forms posted  
in storage area near gauge # in office

8.7 mci C9-137  
40 mci Am-241

AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
<p>1. <u>Organization</u></p> <p>Management organization?  <i>as stated in license backup</i></p> <p>Radiation Protection Organization?  <i>(duties)</i></p> <p>Scope of Operation?</p>	Lic Cond _____	<u>C</u>
<p>NOTES &amp; REMARKS:  <i>David Blackmore should be the RPO.</i></p>		
<p>2. <u>Licensee Internal Audits</u></p> <p>Scope and frequency?</p> <p>Management controls?</p>	Lic Cond _____	<u>N/A</u>
<p>NOTES &amp; REMARKS:</p>		
<p>3. <u>Training and Instructions to Employees</u></p> <p>Training program, scope and frequency, retraining?</p> <p>Required tests administered; scores satisfactory?  <i>(check diplomas)</i></p> <p>Instructions to workers?  <i>(conditions of license)</i></p>	Lic Cond <u>12.</u>	<u>C</u>
<p>NOTES &amp; REMARKS:  <i>Reisart Boyle authorized &amp; trained properly.  Technicians near where gauge is permanently stored are told not to go near it or touch it.</i></p>		
<p>4. <u>Radiation Protection Procedures</u></p> <p>Operating &amp; emergency procedures implemented?</p>	Lic Cond <u>16.</u>	<u>C</u>
<p>NOTES &amp; REMARKS:  <i>Security? Technicians who are near the gauge are instructed to stop anyone other than the users from taking the gauge.</i></p>		
<p>5. <u>Materials, Facilities and Instruments</u></p> <p>Authorized uses and quantities?  <i>(6/12/82) good</i></p> <p>Restricted areas, posting requirements?  <i>(radiation signs) N/A</i></p> <p>Survey instruments &amp; dosimeters; operable, properly calibrated?</p>	Lic Cond <u>16.</u>	<u>C</u>
<p>NOTES &amp; REMARKS:  <i>but a carrying case are present</i></p>		

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
<b>6. Receipt and Transfer of Materials</b>		<u>C</u>
Procedures implemented, adequate?	20.205, 71.51	
Transfer of byproduct material?	30.41	
<del>Control of source material,</del>	40.51, 40.64, 70.42, 70.51, 70.53, 70.54	
Labeling and packaging? <i>(not reqmts)</i>	71.5, 49CFR 170-189	
<i>(Carrying case) YES</i> Records of receipt, transfer, storage, survey, and monitoring? <i>document of special form</i>	30.51	
<del>Procedures for pickup, receipt, monitoring of packages?</del> <i>radioactive source certificate</i>	20.205(b)&(c)	
NOTES & REMARKS: <i>Troxler, doesn't specify results of initial leak test, but encloses with gauge papers a Document of Special Form Radioactive Source Certificate.</i>		
<b>7. Personnel Protection - External</b>		<u>C</u>
Personnel monitoring control; minimize exposures, control of accumulated dose?	20.101, 201.102, 20.202	
Surveys conducted, adequate?	20.201	
Records of monitoring, surveys, disposals? <i>(film badge) <del>RS</del> will be issued in May</i>	20.401, Lic Cond _____	
Levels in unrestricted areas?	20.1, 20.105	
NOTES & REMARKS: <i>Exposures to minors? No minors present in company. R.S. Landauer, Jr. &amp; Co. (Monthly) <del>OK</del></i>		
<b>8. Personnel Protection - Internal</b>		<del>C</del> <u>C</u>
<del>Airborne concentrations in restricted areas?</del>	20.103	
Exposure of minors? <i>N/A</i>	20.104	
<del>Posting of airborne radioactivity areas?</del>	20.203	
<del>Survey, monitoring bioassay requirements, records?</del>	20.201, 20.401	
Leak tests of sealed sources? <i>OK</i>	Lic Cond <u>14.</u>	
NOTES & REMARKS: <i>Rec'd leak test before receipt of sources? (See notes in item # 6) OR states less than .005 <math>\mu</math>ci</i>		

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
9. <u>Effluent Control, Waste Disposal</u>		<del>C</del> <u>C</u>
<del>Release of effluents?</del>	20.106	
Waste disposal, proper packaging for shipment?	20.301, 20.303, 20.304, 20.305	
Procedures, records? <i>will ship to Traxler</i>	20.401, Lic Cond _____	
NOTES & REMARKS:		
10. <u>Transportation</u>		<u>C</u>
<del>Management controls, audits?</del>		
<del>Selection of packaging?</del>	49 CFR 173.393-5; 10 CFR 71	
Preparation of packages for shipment? <i>Fitting</i>	49 CFR 172.173	
and loading, closing, liquids? <i>Document present</i>	49 CFR 172.300	
Markings & labelling? <i>for Type A form</i>	49 CFR 172.402, 403	
<del>Monitoring?</del>	49 CFR 173.393	
Shipping papers, loading and placarding of vehicles?	49 CFR 172.200	
Reports of Incidents?	49 CFR 171.15, 171.16	
<i>✓</i> Training program? <i>(proper transp. in vehicle)</i>		
<del>Examination of packages?</del>		
NOTES & REMARKS: <i>They are going to construct a strong box to padlock &amp; bolt it to the floor of a pick-up truck.</i>		
11. <u>Notifications and Reports</u> <i>(see 14.)</i>		<u>C</u>
To individuals?	19.13	
Overexposures, excessive levels and concentrations, incidents?	20.403, 20.405	
<i>✓</i> Personnel exposures and monitoring, termination reports? <i>NIA (not started yet)</i>	20.407, 20.408	
<i>✓</i> Theft or loss of licensed materials?	20.402	
NOTES & REMARKS: <i>None</i>		

AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
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12. Posting of Notices

Part 20, license & documents, procedures, *NRC-3* 19.11(a)  
 notice of violations? *OK*

NRC-3? 19.11(c)

NOTES & REMARKS:

*Posting of the above form ~ 10 feet from perm. stor. area of gauge in plain sight on wall, and up stairs on wall near stairs leading down to where gauge is stored.*

C

13. Environmental Monitoring Program

Lic Cond \_\_\_\_\_

N/A

Implementation of program, scope and frequency as required?

Records maintained, reviewed by management?

NOTES & REMARKS:

14. Emergency Preparedness

Lic Cond 16.

C

Procedures available for incidents and accidents?

*(Thefts) None*

Training for personnel; coordination with supporting groups and agencies?

NOTES & REMARKS:

*Tech training adequate*

15. Other License Conditions

*Cond. ~~14~~ & 15.  
 Retest. ↑ inventory*

C

NOTES & REMARKS:

*Cond 16. - confirm that maint. is performed by device mfg. ~~As~~ on rod mechanism & source.*

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77710B - Industrial - Academic

AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_ Amendment No: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
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16. Confirmatory Measurements ~~Licensee's~~

Licensee's surveys verified on sampling basis? 201.105, 20.201

NO  
↓

NOTES & REMARKS: use my survey of survey around storage area, but  
- metercable defective -

NRC Instrument: 000896 Calibration due date: 5/11/83

17. Independent Inspection Effort

NOTES & REMARKS:



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APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: \_\_\_\_\_

License No: \_\_\_\_\_

Reference	Basis for noncompliance
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	
Report item _____ 10 CFR _____ Lic Cond _____ Type n/c _____	

(July 82)

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APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: \_\_\_\_\_

License No: \_\_\_\_\_

Identification and summary of action taken	Status
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Report No: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: OPEN  
CLOSED

Report No: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: OPEN  
CLOSED

Report No: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: OPEN  
CLOSED

Report No: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: OPEN  
CLOSED

Report No: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: OPEN  
CLOSED

Report No: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: OPEN  
CLOSED

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APPENDIX C - SUPPLEMENTARY INFORMATION

Licensee: \_\_\_\_\_ License No: \_\_\_\_\_

- 
- |   |   |
|---|---|
| <input type="checkbox"/> Uncorrected/repeated noncompliance       | <input type="checkbox"/> Unresolved items     |
| <input type="checkbox"/> Unusual occurrence, conditions, etc      | <input type="checkbox"/> Inspector's comments |
| <input type="checkbox"/> Basis for change of Category or Priority |   |
-