

**UNITED STATES**  
**DEPARTMENT OF AGRICULTURE**  
OFFICE OF THE ASSISTANT SECRETARY FOR ADMINISTRATION  
OFFICE OF HOMELAND SECURITY  
RADIATION SAFETY DIVISION  
5601 SUNNYSIDE AVENUE, MS 5510  
BELTSVILLE, MD 20705

March 27, 2018

US Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Reply to a Notice of Violation

License No. 19-00915-06  
Docket No. 030-06923

This is in response to your inspection of the USDA's Animal and Plant Health Inspection Service, Pink Bollworm Rearing Facility (PBWRF) in Phoenix, Arizona, and your letter and Notice of Violation dated March 1, 2018. You identified three (3) violations of Nuclear Regulatory Commission (NRC) requirements: failure to (1) use instruments that were properly calibrated; (2) maintain a current copy of the operating and emergency procedures at the irradiator control panel; and (3) implement and maintain procedures for routine maintenance of self-shielded irradiators in accordance with the manufacturer's written recommendations and instructions. The reasons for the violations and corrective actions taken by PBWRF are described below.

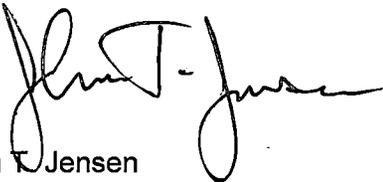
1. The PBWRF did not calibrate radiation monitors at the required frequency or use a check source to check the monitors' response and proper operation prior to each day's use because the PBWRF had stopped daily operations using the irradiator. The less frequent irradiator use resulted in less focus on and attention to routine, daily activities, including checking radiation monitor response, proper operation, and date of calibration. The Facility Director has calibrated (or scheduled calibration for) all radiation monitors and re-trained irradiator operators to use a check source to ensure proper operation of radiation monitors. Irradiator operators will enter the results of the daily radiation monitor source checks in the irradiator use log and include the calibration date of the radiation monitors that were checked. The log will be reviewed periodically by the Facility Director to ensure continued compliance with these requirements. The PBWRF has achieved full compliance with these requirements.

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2. The PBWRF did not maintain a current copy of the operating and emergency procedures at the irradiator control panel. A copy of the operating and emergency procedures was placed in a cabinet near the irradiator control panel. This cabinet was frequently accessed by irradiator operators and PBWRF representatives believed that this configuration was adequate to comply with the requirement. The operating and emergency procedures are now posted on a bulletin board visible from the irradiator control panel. The PBWRF has achieved full compliance with this requirement.
  
3. The PBWRF did not implement and maintain procedures for routine maintenance of self-shielded irradiators in accordance with the manufacturer's written recommendations and instructions. The PBWRF discontinued its practice of contracting a licensed irradiator service provider to conduct periodic preventive maintenance inspections of the irradiator because the PBWRF had reduced its use of the irradiator and did not need frequent inspections to ensure proper irradiator operation. The preventive maintenance inspections included checks of the source interlock system and the door interlock system. The PBWRF equipment specialist will perform the checks of the source interlock system and the door interlock system at the required frequency and in accordance with the manufacturer's instructions and enter the results of these checks in the irradiator use log for periodic review by the Facility Director. The PBWRF has achieved full compliance with this requirement.

We appreciate your bringing these issues to our attention and thank you for the opportunity to correct the violations and improve our radiation safety program. Please contact me on 301-504-2441, if you have any questions.

Sincerely,



John T. Jensen  
Chief

cc:  
Regional Administrator, NRC Region I