

NOV 13 1989

In Reply Refer To:
License: 35-17178-01
Docket: 30-12319/89-02
EA: 89-223

Tulsa Gamma Ray, Inc.
ATTN: James C. Moss
President
1127 South Lewis Avenue
Tulsa, Oklahoma 74104

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Ms. L. L. Kasner of this office on October 2-4, 1989, of the activities authorized by NRC Byproduct Material License 35-17178-01, and to the discussion of our findings held by the inspector with members of your staff at the conclusion of the inspection. The enclosed NRC Inspection Report 30-12319/89-02 documents this inspection.

The inspection was an examination of the activities conducted under the license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of the license. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, independent measurements, and observations by the inspector of licensee personnel conducting radiography at two field sites.

The inspector also reviewed the actions you had taken with respect to the violations observed during our previous inspection conducted on November 29 and 30, 1988. She verified that the corrective actions for some of the violations documented in the Notice of Violation dated January 10, 1989, had been implemented as stated in your replies dated January 9 and March 8, 1989. However, we noted that your corrective action for Violation No. 4 had not been completed as of the date of this inspection in that NRC has not completed review of your submitted quality assurance program for transportation packaging. These items will be reviewed in a future inspection to verify that your corrective actions have been implemented and are effective.

The NRC inspection identified a significant weakness in management of your radiation safety program. The lack of attention to detail observed in several areas of your program raises question to the effectiveness of management's oversight of those tasks delegated to individuals within your organization. Of specific concern to us is the failure of management to provide guidance and ensure that individuals tasked with performing radiation safety duties have adequate technical expertise. Additionally, we are concerned about the overall implementation of your program in that although you have corrected some of the violations identified during the previous inspection, violations related to the same program areas have occurred during this inspection period.

*RIV:NMIS	*C:NMIS	*EO	*D:DRSC
LLKasner:jt	CLCain	GFSanborn	ABBeach
/ /89	/ /89	/ /89	/ /89

*Previously Concurred

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We are releasing this report at this time for your information. You will be notified by separate correspondence of our decision regarding enforcement action based on the findings of this inspection. No written response to this report is required at this time; however, you may provide a response at this time, in particular if you wish to describe any corrective actions taken.

This letter also confirms the November 9, 1989, telephone conversation between C. L. Cain, L. L. Kasner, and J. C. Moss of your organization concerning NRC's request to conduct an enforcement conference concerning these issues. The date agreed upon was November 20, 1989, at 1 p.m. for this enforcement conference in our Arlington office. During the enforcement conference, you should be prepared to address those specific items referenced in the NRC inspection report as well as those specific actions planned or taken to improve the effectiveness of the management control of your licensed operations, with particular emphasis on measures currently being taken to prevent further violations.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,
Original Signed By:

A. B. BEACH

A. Bill Beach, Director
Division of Radiation Safety and
Safeguards

Enclosures:

1. Appendix A - NRC Inspection Report
30-12319/89-02
2. Appendix B - Proposed Enforcement Conference Agenda

cc w/enclosures:

Oklahoma Radiation Control Program Director

bcc:

DMB - Original (IE-07)
ABBeach
LShea, RM/ALF (AR-2015)
*RJEverett
*NMIS
*RIV Files (2)
*REHall, URFO
LJLieberman

RDMartin
LAYandell
*CLCain
*LLKasner
*MIS System
*RSTS Operator
*GFSanborn
*NMIS Inspectors (4)

*W/766