

JAN - 3 1990

License No. 42-23539-01AF
Docket No. 030-28641
EA 89-230

Department of the Air Force
USAF Radioisotope Committee
HQ AFOMS/SGPR
Brooks Air Force Base, Texas 78235-5000

Gentlemen:

Enclosed is the OI investigation report synopsis which was inadvertently omitted from our December 27, 1989, letter.

Sincerely,

**ORIGINAL SIGNED BY
J.M. MONTGOMERY**

Robert D. Martin
Regional Administrator

Enclosure:
OI Synopsis

cc:
Mississippi Radiation Control Program Director
NRC Public Document Room

RIV:D:DRSS
ABBeach:dd
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SYNOPSIS

In February 1988, the Nuclear Regulatory Commission (NRC), Region IV, requested an investigation to determine if United States Air Force (USAF) personnel at the Keesler Air Force Base (AFB) Medical Center in Mississippi or at Brooks AFB in San Antonio, Texas intentional did not comply with NRC regulations regarding possession limitations of byproduct material and incineration of radioactive waste. In December 1985, Keesler Medical Center's Radiation Safety Committee (RSC) determined that they were in violation of NRC regulations by maintaining over 200 microcuries of Iodine-125 (I-125) and incinerating I-125 wastes. The USAF broad scope license did not authorize Brooks AFB to grant a specific permit to Keesler AFB for incineration of I-125, so Brooks AFB requested that the NRC grant an amendment to their broad scope license. This amendment was issued by the NRC on July 1, 1987. While the NRC was reviewing the amendment request, Keesler's RSC apparently decided to continue incineration of I-125 wastes.

The Office of Investigations (OI) investigation determined that, at the recommendation of Keesler's Radiation Safety Officer (RSO), the Keesler RSC, during its quarterly meeting in December 1985 decided to remain in noncompliance with NRC regulations pending receipt of an amendment to its material permit. A copy of the meeting minutes was forwarded to the Brooks AFB Radioisotope Committee for review.

The Brooks AFB Radioisotope Committee, which had the authority to prevent unauthorized or incorrect actions by Keesler, could not substantiate having taken any action to stop this violation of NRC regulations. The Brooks AFB Medical Permit Receiver admitted he reviewed the meeting minutes and claimed he must have notified the Keesler RSO to discontinue incineration, although he did not specifically recall doing so. He further alleged that his written telephone logs from this time period had disappeared, so he had no written documentation to substantiate his contention. Review of the Brooks/Keesler correspondence files failed to disclose any written orders to Keesler or any document that addressed the incineration issue.

The Brooks AFB Medical Permit Receiver acted with careless disregard for NRC regulations by failing to follow standard USAF procedures by not notifying Keesler in writing to discontinue its noncompliance with Federal regulations. The Keesler RSO knowingly and intentionally violated NRC regulations by allowing the medical center to continue to exceed the legal possession limitations for I-125 and to incinerate I-125 wastes.

Department of the Air Force

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