

JAN 17 1990

In Reply Refer To:
License: 35-13617-01
Docket: 30-05965/89-01
EA No.: 90-004

Firestone Tire and Rubber Company
ATTN: Tom Crofutt, Plant Manager
P.O. Box 24011
2500 South Council Road
Oklahoma City, Oklahoma 73124

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Mr. Anthony D. Gaines of this office on November 29-30, 1989, of the activities authorized by NRC Byproduct Material License 35-13617-01, and to the discussion of our findings held by the inspector with you and members of your staff at the conclusion of the inspection. The enclosed NRC Inspection Report 30-05965/89-01 documents this inspection. This also acknowledges receipt of your letter with attachments both dated December 29, 1989, wherein you declared a gauge to be lost and reported corrective actions in regard to some of the violations identified during the 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.

This inspection revealed an apparent lack of management oversight of the radiation safety program. This lack of attention to program requirements contributed to situations representing potential safety risks. Specifically, your failure to conduct adequate training programs led to situations where members of your staff were unfamiliar with and failed to follow lockout procedures while working in areas surrounding nuclear gauges with sources in unshielded positions. Although this did not result in significant exposure to personnel, we are nonetheless concerned that Firestone apparently did not meet the training requirements imposed by 10 CFR Part 19 and the conditions of its license. Firestone's failure to observe limitations imposed by license conditions resulted in the removal, installation, and repair of fixed nuclear gauges by unauthorized individuals. Additionally, the apparent failure to conduct inventories of licensed material contributed to the failure to recognize the loss of a nuclear gauge.

In accordance with the NRC's Enforcement Policy, 10 CFR Part 2, Appendix C, the apparent violations disclosed by this inspection are being considered for escalated enforcement action.

*RIV:NMIS	*C:NMIS	*EO	D:OASS
ADGaines:lm	CLCain	GFSanborn	ABBeach
/ /90	/ /90	/ /90	1 /17/90

*Previously concurred

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REG4 LIC30
35-13617-01 PDC

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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.

This inspection revealed significant lack of management oversight of the radiation safety program. This lack of attention to program requirements contributed to situations representing potential safety risks. Specifically, your failure to conduct adequate training programs led to situations where members of your staff were unfamiliar with and failed to follow lockout procedures while working in areas surrounding nuclear gauges with sources in unshielded positions. Although this did not result in significant exposure to personnel, we are nonetheless concerned that you did not meet the training requirements imposed by 10 CFR Part 19 and the conditions of your license. Your failure to observe limitations imposed by license conditions resulted in violations related to removal, installation, and repair of fixed nuclear gauges by unauthorized individuals. Additionally, your oversight in conducting inventories of licensed material contributed to your failure to recognize the loss of a nuclear gauge.

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

RIV:NMIS~~MC~~
ADGaines:lm
1/8/89

C:NMIS~~MC~~
CLCain
1/8/89

EO ~~CF~~
GFSanborn
1/8/89

D:DRSS
ABBeach
/ /89

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

This letter also confirms the telephone conversation between Mr. Charles L. Cain of my staff and Mr. Tom Crofutt on January 12, 1990, concerning our request to conduct an enforcement conference at our office in Arlington, Texas. The date and time agreed upon was Friday, February 2, 1990, at 1 p.m. This enforcement conference will address the findings of the NRC inspection referenced above and your response to these findings. These findings also appear to indicate a lack of management control over the radiation safety program. Please be prepared to discuss this issue as well during the enforcement conference.

Should you have any questions concerning this letter, 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 30-05965/89-01
2. Appendix B - Enforcement
Conference Agenda

cc w/encl:

U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Oklahoma Radiation Control Program Director

bcc:

DMB - Original (IE-07)	RDMartin
ABBeach	LAYandell
LShea, RM/ALF (AR-2015)	*CLCain
*WLFisher	*ADGaines
*NMIS	*MIS System
*RIV Files (2)	*RSTS Operator
*REHall, URFO	*GFSanborn
*JLieberman	

*W/766