

INSPECTOR'S REPORT
Office of Inspection and Enforcement

REVIEWER
Kasner, Linda
C.L. Cain cle

INSPECTORS

LICENSEE/VENDOR: Phillips Petroleum Company / Phillips Research Center
TRANSACTION TYPE: X - INSERT
DOCKET NO. (BY PRODUCT): 22005887
REPORT NO. SEQ. NO. YR.: 89011 - 119

PERIOD OF INVESTIGATION/INSPECTION: FROM 10/28/89 TO 11/03/89
INSPECTION PERFORMED BY: X 1 - REGIONAL OFFICE STAFF
ORGANIZATION CODE (IF REGION/NO CONDUCTING ACTIVITY): 4 3 4

REGIONAL ACTION: 2 - REGIONAL OFFICE LETTER
TYPE OF ACTIVITY CONDUCTED: X 02 - SAFETY, 06 - MGMT VISIT, 10 - FLART SEC., 14 - INQUIRY

VIOLATION INVESTIGATION FINDINGS: 03
TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS: 03
ENFORCEMENT CONFERENCE: 42
REPORT CONTAINING INFO: 43
LETTER OF REPORT TRANSMITTAL DATE: 2/06/90

MODULE INFORMATION table with columns for Module Number, Insp, Phase, and Status. Includes entries for Management Meeting, Transportation, Noncompliance Followup, Waste Management, and Radiation Protection.

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REVIEWER: Kasner, Linda
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SPECTORS	
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LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. & CLASS OF LICENSE NO. (BY PRODUCT) (13 digits)	REPORT		NEXT INSP. DATE	
			NO	SEQ	MO	YR
<u>Phillips Petroleum Company</u> <u>Phillips Refining Center</u>	X 1 - INSERT M - MODIFY D - DELETE R - REPLACE	<u>C2005897</u>	<u>89011</u>	<u>-</u>	<u>1</u>	<u>9</u>

PERIOD OF INVESTIGATION/INSPECTION		INSPECTION PERFORMED BY		ORGANIZATION CODE (IF REGION/NO CONDUCTING ACTIVITY USE REG. (153) Management Region)		
FROM	TO	X 1 - REGIONAL OFFICE STAFF	OTHER	REG. NO.	VISION	FRANCH.
DAY YR MO DAY -	DAY -	2 - RESIDENT INSPECTOR		4	3	4
<u>110128191111101394</u>		3 - PERFORMANCE APPRAISAL TEAM				

REGIONAL ACTION (Check one box only)	TYPE OF ACTIVITY CONDUCTED (Check one box only)			
1 - NRC FORM 801	X 12 - SAFETY	06 - MGMT VISIT	10 - PLANT SEC.	14 - INQUIRY
2 - REGIONAL OFFICE LETTER	22 - INCIDENT	07 - SPECIAL	11 - INVENT VER	15 - INVESTIGATION
	34 - ENFORCEMENT	08 - VENDOR	12 - SHIPMENT EXPORT	
	36 - MGMT AUDIT	09 - MAT ACCT	13 - IMPORT	

INSPECTION INVESTIGATION FINDINGS (NRC FORM 801 only)	TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS	ENFORCEMENT CONFERENCE HELD	REPORT CONTAINS INFO INFORMATION	LETTER OF REPORT TRANSMITTAL DATE
A B C D I				NRC FORM 801 (801) LETTER II FILED
1 - CLEAR	<u>03</u>			REPORT SENT TO HQ FOR ACTION
2 - VIOLATION				MO DAY -
3 - DEVIATION				MO DAY -
4 - VIOLATION & DEVIATION				<u>2 06 89</u>

MODULE INFORMATION										MODULE INFORMATION										
MODULE NUMBER INSP					MODULE REQ FOLLOWUP					MODULE NUMBER INSP					MODULE REQ FOLLOWUP					
PHASE	MANUAL	CHAPTER	PROCEEDING	LEVEL	PHASE	MANUAL	CHAPTER	PROCEEDING	LEVEL	PHASE	MANUAL	CHAPTER	PROCEEDING	LEVEL	PHASE	MANUAL	CHAPTER	PROCEEDING	LEVEL	
5	3	0	7	0	3	B	A			5	8	6	7	4	0	A				
Management Meeting										Transportation										
5	9	0	0	0	0	B	A			5	9	2	7	0	2	A				
Insuff										Noncompliance Followup										
5	8	7	1	0	0	A				5	8	4	5	8	0	A				
Program Requirements										WASTE MANAGEMENT										
5	8	3	8	3	2	A									A					
Radiation Protection																				
9002160115 900131 REG4 LIC30 35-00313-03 PDC																				

**INSPECTOR'S REPORT
(Continuation)**

Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		RE NO.		MODULE NUMBER		VI	VIOLATION SEVERITY OR DEVIATION						SITE RELATED	
03005847		8901		581711001			1 2 3 4 5 6						A C B D	

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

License Condition 7.B. authorizes the possession of sealed sources.
 License Condition 6.B. authorizes the possession of such sources containing any byproduct material with Atomic Numbers 4 through 83.

Contrary to the above, on February 6, 1986, the licensee had received a 30-millicurie plutonium-238 sealed source (Amersham Model PPC, Serial No. B350), a material they were not authorized to possess. The source was transferred from another license held by Phillips Petroleum Company in Bartlesville, Oklahoma. The source was still in the licensee's possession during an inspection conducted on November 2 and 3, 1989.

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(Continuation)**

Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE NO. (8 BY PRODUCT) (13 digits)		RE NO.		MODULE NUMBER	
03005897		8901		587100 VI	
VIOLATION SEVERITY OR DEVIATION				SITE RELATED	
				A C	
				B D	

VIOLATION OR DEVIATION (Enter up to 240 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit one to 50 characters each.)

License Condition 17 requires that licensed material shall be possessed and used in accordance with statements, representations, and procedures contained in an application dated September 4, 1987, and letter dated October 24, 1987. Portions of these documents describe the licensee's training program, internal audit program, and survey instrument calibration standards.

a. Item 6 of the application describes the institutional training program. Specifically, this includes general instruction to personnel biannually including interaction of radiation, ALARA, biological effects of radiation, safety measures, waste management, personnel monitoring, record keeping, NRC regulations, and updates.

Contrary to the above, during the period from October 1987 through October 1989, the licensee had conducted only one training session, on October 28, 1988, and had not met the required biannual interval.

b. Item 20 of the application specifies that the RSO will conduct semiannual audits of each authorized user in the program. These audits are to include posting of required signs and notices; waste disposal containers; use of gloves; storage area; receipt, utilization and disposal records; inventory; and surveys.

Contrary to the above, the inspector determined that the licensee had conducted one such audit in December 1988, but had not performed program audits at the required semiannual intervals during the period from October 1987 through October 1989.

c. Item 12 of the application specifies that survey instruments will be calibrated annually and following repair. This item further specifies that instruments will be considered properly calibrated when readings are within 10 percent of the known value for each point checked. Instruments reading within 20 percent may be used only if accompanied by a calibration chart attached to the instrument.

Contrary to the above, the inspector determined that the licensee's 13 survey instruments had been calibrated in December 1987 and not again until March or April 1989, a period exceeding the required annual interval. Additionally, two of these instruments were 25-30 percent off the acceptable calibration reading and one instrument was 40-50 percent off the acceptable value. The licensee had used these instruments during this period to perform routine radiation surveys.

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DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		REF. NO.		MODULE NUMBER		VI	SITE RELATED	
03005847		8901		58711010				A B C D
				VIOLATION SEVERITY OR DEVIATION		1 2 3 4 5 6		
							A C E D	

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

License Condition 17 requires that licensed materials shall be possessed and used in accordance with statements, representations, and procedures contained in an application dated September 4, 1987, and letter dated October 24, 1987. Sections of these documents describe the licensee's waste management program including waste storage area and required radiation surveys and records.

a. Item 8 of the application specifies that all radioactive waste material will be held for decay or storage in an area identified as Building 88-H.

Contrary to the above, during October 1989 the licensee had moved the radioactive waste storage area from the designated location at Building 88-H to Building 85-E.

b. Item 14 of the application specifies that radiation surveys will be routinely performed and that records of survey date, location, and surveyors will be maintained. Item 15 of the application specifies that surveys of the waste storage area will be performed monthly.

Contrary to the above, the inspector determined that surveys of the licensee's waste storage area had been conducted at the required monthly interval but that records of such surveys had not been maintained as required.

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