

FEB 15 1990

In Reply Refer To:  
License: 42-13553-02  
Docket: 30-09727/90-01

CBI Industries, Inc.  
ATTN: W. D. Colbert, Vice President  
P.O. Box 692001  
8900 Fairbanks North Houston Road  
Houston, Texas 77269-2001

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Ms. L. L. Kasner of this office on January 12, 1990, of the activities authorized by NRC Byproduct Material License 42-13553-02, and to the discussion of our findings held by the inspector with your radiation safety officer (RSO) at the conclusion of 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, and observations by the inspector.

During this inspection, certain of your activities were found not to be conducted in full compliance with NRC requirements. Consequently, you are required to respond to this matter in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation enclosed with this letter.

The inspector observed that, generally, your procedures and documentation related to byproduct material use, transportation, equipment maintenance, and instrument calibrations met the requirements of the regulations and the conditions of your license. She observed that training programs for new personnel had been conducted as described in your license application.

The inspector also observed that several monthly radiation exposure records were missing for one of your field offices during 1989. This involved both the failure to have maintained the record provided by your vendor as well as the failure to have evaluated occupational exposure for periods when monitoring devices were damaged or missing. The inspector reviewed this with your RSO who indicated that he had been aware of a problem related to delayed reporting by your vendor, but that he had not noted that the problems identified by the inspector appeared to be related to one field office. Your review of this problem should include correction of radiation exposure discrepancies for those individuals identified during this inspection.

RIV:NMIS0xc  
LLKasner:lm  
2/13/90

C:NMIS0xc  
CLCain  
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D DRSS  
A Beach  
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The inspector also reviewed the actions you had taken with respect to the violation observed during our previous inspection conducted on January 13, 1989. She verified that the corrective actions for the violation had been implemented.

We are concerned about the implementation of your program and the weaknesses in the oversight in your program that permitted these violations to occur. Consequently, in your reply to this letter, you should describe 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.

The response directed by this letter and the accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

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

Enclosure:  
Appendix - Notice of Violation

cc:  
Texas Radiation Control Program Director

bcc:  
DMB - Original (IE-07)  
RDMartin  
ABBeach  
LAYandell  
Glenda Jackson OC/LFMB (4503)  
\*CLCain  
\*WLFisher  
\*LLKasner  
\*NMIS  
\*MIS System  
\*RIV Files (2)  
\*RSTS Operator  
\*REHall, URFO

\*W/766