

SAFETY INSPECTION 89-001

1. LICENSEE

WASTE MANAGEMENT, INC.  
1121 BORDENTOWN ROAD  
MORRISVILLE, PA 19067

2. REGIONAL OFFICE

Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

3. DOCKET NUMBER(S)

30-20016

4. LICENSE NUMBER(S)

37-20638-01

5. DATE OF INSPECTION

June 15, 1989

Licenses:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission's (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews, with personnel, and observations by the inspector. The findings as a result of this inspection are as follows:

- ☒ 1. Within the scope of this inspection, no violations were observed.
- ☒ 2. The inspector also verified the steps you have taken to correct the violations identified during the last inspection. We have no further questions on those actions at this time.

- ☐ 3. During this inspection certain of your activities, as checked below, were in violation of NRC requirements.

THIS IS A NOTICE OF VIOLATION which is required to be posted in accordance with 10 CFR 19.11.

☐ A. \_\_\_\_\_ was not properly posted to indicate the presence of a \_\_\_\_\_, 10 CFR 20.203(b), (c), (d), (e) or 34.42.

☐ B. Containers located in \_\_\_\_\_ were not properly labeled to indicate the presence of radioactive material. 10 CFR 20.203(f)(1), or (f)(2).

☐ C. \_\_\_\_\_ of sealed sources were not performed at the proper frequencies. 10 CFR \_\_\_\_\_ License Condition Number \_\_\_\_\_

☐ D. Records of \_\_\_\_\_ were not properly maintained. 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_

☐ E. Documents were not properly posted or otherwise made available. 10 CFR 19.11.

☐ F. Reports or notifications of \_\_\_\_\_ were not made in accordance with 10 CFR \_\_\_\_\_ or License Condition Number \_\_\_\_\_

☐ H. \_\_\_\_\_

☐ I. \_\_\_\_\_

☐ J. \_\_\_\_\_

☐ K. \_\_\_\_\_  
DESIGNATED ORIGINAL  
Certified By: \_\_\_\_\_

RETURN ORIGINAL TO  
REGION I

IE-07

I hereby state that within 30 days the actions described by me to the inspector will be taken to correct the violations identified in the items checked above. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201. No further response will be submitted unless required by the NRC.

SIGNATURE - LICENSEE

900223015B 900216  
PDR FOIA  
SANDERS90-15 PDR

DATE

SIGNATURE - NRC INSPECTOR

DATE

DAVID J. COLLINS

A122

LICENSEE: Waste Management of NA Inc REPORT NO. \_\_\_\_\_

ADDRESS: Northeast Region  
1121 Bordentown Road  
Morrisville PA 19067

LICENSEE CONTACT: Wayne Kudenchak TELEPHONE NO. 215-736-2000

LICENSE NUMBER	DOCKET NUMBER	CATEGORY	PRIORITY	PROGRAM CODE
<u>37-20638-01</u>	<u>30-20016</u>	<u>312 E1</u>	<u>4</u>	<u>3121</u>
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

INSPECTION DATE (S) June 15, 1989

TYPE OF INSPECTION

LOCATION(S) above /

☐ / SPECIAL ☒ / ROUTINE  
☐ / ANNOUNCED ☒ / UNANNOUNCED  
☐ / DAYSHIFT ☐ / BACKSHIFT

SUMMARY OF FINDINGS AND ACTION

☒ NO NONCOMPLIANCE, 591 ☒ ACTION ON PREVIOUS NONCOMPLIANCE, APPENDIX B  
☐ / NO NONCOMPLIANCE, LETTER ☐ / SUPPLEMENTAL INFORMATION, APPENDIX C  
☐ / NONCOMPLIANCE, 591 APPENDIX C  
☐ / NONCOMPLIANCE, LETTER

PERSONS CONTACTED (Name, Title)

\* Wayne Kudenchak RSO Project Manager  
\* Anthony Eith Mgr Engineering Services

\* attended exit meeting

Inspector Signature, Date

Inspector Signature, Date

APPROVED

Signature, Date

		RESULTS
1.	<u>ORGANIZATION</u>	C NC
a.	Describe the management structure.	C NC
	Elth - P.E. & Mgr. Engr. Svc. NE Region, Envir. Mgmt Dept L Wayne Kudenchak - Proj. mgr & RSO	
b.	Describe the radiation protection organization.	C NC
	<pre>       [-----]                         RSO       Users           </pre>	
c.	Individuals identified in the license as being responsible for the programs still hold these positions.	C NC
d.	Radiation Safety Committee operates as required.	C NC (NA) NI
	1. meeting frequency: _____	
	2. records maintained _____	y/n/na/ni
	3. records reviewed by inspector _____	
	for period _____ to _____	
	4. required persons in attendance _____	y/n/na/ni
e.	Management control programs conducted as required.	C NC (NA) NI
	1. records maintained _____	y/n/na/ni
	2. Describe scope, frequency, etc.	

#### Comments

Anthony W. Elth, P.E.  
Manager - Engineering Services

Waste Management of  
North America, Inc.  
Northeast Region  
Environmental Management Department  
1121 Bordentown Road  
Morrisville, PA 19067  
215-736-2000

Wayne Kudenchak  
Project Manager

Waste Management of  
North America, Inc.  
Northeast Region  
Environmental Management Department  
1121 Bordentown Road  
Morrisville, PA 19067  
215-736-2000  
FAX: 215-736-0518





		RESULTS
2.	<u>SCOPE OF LICENSED ACTIVITIES</u>	C NC
a.	Describe the types of current activities.	C NC
	create & operate landfills throughout NE USA	
b.	Describe the current workload in terms of number of workers, quantities of radioactive material used each week/month/year, frequency of use, other appropriate information	
	one gauge owned one gauge stored for another c	
c.	Describe any changes since the last inspection, and any which may be planned.	
	none	

Comments

		RESULTS			
3.	TRAINING AND INSTRUCTIONS TO EMPLOYEES	C	NC		
a.	Instruction to all persons working in a restricted area (19.12).	C	NC		
b.	Additional required training for users and other specified workers.	C	NC	NA	NI
1.	approved training program	y	n	na	ni
2.	training provided by <u>Vendor</u>	y	n	na	ni
3.	users complete on-the-job training	y	n	na	ni
4.	tests are given				
a.	written	y	n	na	ni
b.	oral	y	n	na	ni
c.	practical	y	n	na	ni
d.	records of tests maintained	y	n	na	ni
e.	deficiencies noted	y	n	na	ni
5.	test results reviewed by NRC inspector for period _____ to _____	y	n	na	ni
c.	Periodic training is implemented as required.	C	NC	NA	NI
1.	records of retraining maintained	y	n	na	ni
2.	Describe frequency and scope of periodic training				
d.	Employees interviewed appeared familiar with safe handling practices and other requirements.	C	NC	NA	NI

Comments

material  
circulated  
WMS 5 newsletter  
safety issues

		RESULTS			
4.	<u>MATERIALS</u>	C	NC		
a.	Radioactive material as authorized by license.	C	NC		
	1. type and quantity authorized			y/n	
	2. inventory records maintained			y/n/na/ni	
	3. inventory records reviewed for period <u>86</u> to <u>89</u>				
b.	Control of source material (Part 40) and special nuclear material (Part 70) as required.	C	NC	NA	NI
	1. transfers in accordance with 40.51/70.42, 70.54			y/n/na/ni	
	2. records and inventory required by 40.61/70.51			y/n/na/ni	
	3. reports in accordance with 40.64/70.53, 70.54			y/n/na/ni	

Comments

		RESULTS			
5. FACILITIES MAINTAINED AS DESCRIBED IN APPLICATION		C	NC		
a.	postings and labelings as required	C	NC		
1.	20.203(b) radiation area			y/n/na/ni	
2.	20.203(d) airborne radiation area			y/n/na/ni	
3.	20.203(e) use or storage areas posted with "Caution - Radioactive Material"			y/n/na/ni	
4.	20.203(f) containers and devices properly labeled			y/n/na/ni	
5.	19.11(a)(b) posting of documents			y/n/na/ni	
6.	19.11(c) posting of NRC-3			y/n/na/ni	
7.	20.203(c) high radiation areas			y/n/na/ni	
b.	Security of licensed material is maintained.	C	NC		
1.	locked in device cabinet or room			y/n/na/ni	
2.	secured to prevent unauthorized removal from an unrestricted area			y/n/na/ni	
3.	devices and materials secured at field location			y/n/na/ni	
c.	High Radiation Area operated as required.	C	NC	NA	NI
1.	posted as required by 20.203(c)(1)				yes/no
2.	interlocked as required by 20.203(c)(2)(i)				yes/no
3.	entrance controlled in accordance with 20.203(c)(2)				yes/no
4.	exit controlled in accordance with 20.203(c)(3)				yes/no
5.	surveillance or locked to prevent unauthorized entry as required by 20.203(c)(4)				yes/no
6.	visible and audible signals operate correctly to warn of the presence of radiation				yes/no
7.	alarm tested at required intervals				yes/no
8.	records of alarm system test maintained				yes/no
9.	exposure devices and storage containers meet radiation level limits of 20.203				yes/no

Comments



		RESULTS																		
6.	<u>INSTRUMENTS, EQUIPMENT, AND DEVICES</u>	C	NC																	
a.	calibrated and operable meters available and used properly.	C	NC	NA	NI															
1.	number, type, and ranges (e.g. 2, ion chamber, 1R/hr; 3, GM, 10,000 cpm)																			
	<table border="1"> <thead> <tr> <th>Number</th> <th>Type</th> <th>Range</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table>	Number	Type	Range																
Number	Type	Range																		
3.	calibrated by: _____																			
4.	calibration method as authorized _____				y/n/na/ni															
5.	calibration interval _____ as required _____				y/n/na/ni															
6.	Records reviewed by NRC inspector for the period _____ to _____																			
b.	other special equipment (ventilation, hoods, shielding, etc) operable and available as described in license. Description:	C	NC	NA	NI															
	_____																			
	_____																			
	_____																			
	_____																			
	_____																			
	_____																			
	_____																			

Comments



		RESULTS			
7.	RECEIPT AND TRANSFER OF MATERIALS	C	NC	NA	NI
a.	Procedures for picking up, receiving, and opening of packages performed as required by 20.205.	C	NC	NA	NI
	1. written procedures available			y/n/na/ni	
	2. procedures approved in application			y/n/na/ni	
	3. survey of packages when received			y/n/na/ni	
	4. 20.401 records of survey of packages			y/n/na/ni	
	5. 20.401 records of receipt of packages			y/n/na/ni	
b.	Licensed material transferred as required.	C	NC	NA	NI
	1. 30.41 verification of recipient's license			y/n/na/ni	
	2. 20.401, 30.51 records of transfer maintained			y/n/na/ni	
	3. Licensee makes shipments of radioactive materials			yes/no	
	a. delivered by common carrier			yes/no	
	b. transported in licensee's own vehicle as a private carrier.			yes/no	

\*IF ABOVE IS ANSWERED "YES", COMPLETE 7.A TRANSPORTATION

COMMENTS

## RESULTS

## 7.A. TRANSPORTATION

		C	NC	NA	NI
1. Are authorized packages used	173.415-416			yes/no	
2. Types of packages used (for example, DOT-7A)	173.415			DOT-7A	
3. Performance test records on file	173.416(a)			yes/no	
4. Licensee aware of 6/30/85 cutoff on use ( ) certified	173.416(b)			yes/no	
5. NRC COC's on file	71.12(c)(1)			yes/no	
6. Registered with NRC as user	71.12(c)(3)			yes/no	
7. Documented NRC-approved Q/A program?	71.12(b)			yes/no	
NRC Q/A Approval number					
8. Special Form Material Performance test records available for each source design	173.476(a)			yes/no/na	
9. packages labeled as required	172.403 (a-f)			yes/no	
a. Excepted					
b. White I					
c. Yellow II					
d. Yellow III					
10. Surveys performed to select correct label category and compliance with radiation limits	175.475(1)			yes/no	
11. Packages marked as required with	172.300-310			yes/no	
a. shipping name				yes/no	
b. Spec No.					
c. Certificate of Compliance (COC) No. etc.					
12. Shipping papers are prepared for each shipment	172.200			yes/no	
13. Shipping papers contain required information	172.203(d)			yes/no	
14. For private carrier shipments:					
a. vehicles placarded as required	172.500,504			yes/no	
b. cargo blocked, braced, tied down in vehicle	177.842(d)			yes/no	
c. any incidents reported to DOT	171.15-16			yes/no	
15. Licensee carries shipping papers that are readily accessible when transporting radioactive material					

Comments

		RESULTS			
8. PERSONNEL MONITORING		C	NC	NA	NI
a. Personnel dosimetry assigned and worn as required.		C	NC	NA	NI
1. whole-body dosimeter used		y/n/na/ni			
a. <input checked="" type="checkbox"/> film <span style="float: right;">TLD</span>					
b. exchange frequency: <u>monthly</u> <u>qtrly</u>					
c. supplier <u>Landauer</u>					
d. supplier NVLAP accredited 10 CFR 20.202		y/n/na/ni			
2. extremity dosimetry used		y/n/na/ni			
3. workers observed wearing required dosimetry		y/n/na/ni			
b. Personnel dosimetry reports maintained as required		C	NC	NA	NI
1. records reviewed by management frequency:		y/n/na/ni			
2. NRC inspector reviewed personnel monitoring records from <u>85</u> <del>86</del> to <u>89</u>		y/n/na/ni			
a. whole body quarterly dose: typical <u>70</u>		max			
b. extremity quarterly dose: typical <u>      </u>		max			
3. Forms NRC-4, NRC-5 or equivalent records completed		y/n/na/ni			
4. Termination and annual reports to individuals and NRC, as required		y/n/na/ni			
c. Formal ALARA program is implemented		C	NC	NA	NI
<u>Comments</u>					

		RESULTS
9.	<u>RADIATION AND CONTAMINATION SURVEYS</u>	C NC
a.	Radiation and Contamination surveys	C NC <u>NA</u> NI
1.	radiation and contamination surveys recorded	y/n/na/ni
2.	surveys performed at required frequency: _____	y/n/na/ni
3.	appropriate instruments used	y/n/na/ni
4.	action limits observed, and post-decontamination surveys performed when necessary	y/n/na/ni
5.	NRC inspector reviewed survey records for the period _____ to _____	
6.	maximum radiation levels in unrestricted area: _____	
b.	Airborne Radioactivity Surveys performed	C NC NA NI
1.	Air sampling in restricted areas	y/n/na/ni
a.	maximum concentration levels: _____	
b.	typical concentration levels: _____	
2.	bioassay procedures performed	y/n/na/ni
a.	type(s) _____	
b.	maximum results _____	
c.	typical results _____	
3.	bioassay and air sampling records maintained as required	y/n/na/ni
4.	Principal isotopes _____	
c.	Leak tests of sealed sources performed as required	C NC NA NI
1.	performed by user and method approved	y/n/na/ni
2.	tested at required interval: <u>6 mo</u>	y/n/na/ni
3.	records maintained	y/n/na/ni
4.	records reviewed by NRC inspector <u>JP</u> for the period <u>86</u> to <u>87</u>	

Comments



		RESULTS			
10. EFFLUENT CONTROL, WASTE DISPOSAL		C	NC	NA	NI
a.	Releases to the environment in accordance with requirements.	C	NC	NA	NI
1.	airborne releases are made			y/n/na/ni	
	a. evaluations adequate			y/n/na/ni	
	b. releases within limits (10 CFR 20.106)			y/n/na/ni	
	c. typical concentrations _____				
	d. principal isotopes released _____				
2.	liquid releases are made to _____ (sewer, unrestricted)			y/n/na/ni	
	a. evaluations adequate			y/n/na/ni	
	b. releases within limits (10 CFR 20.106, 10 CFR 20.303)			y/n/na/ni	
	c. typical concentrations _____				
	d. principal isotopes released _____				
3.	Records maintained			y/n/na/ni	
b.	Waste disposal in accordance with requirements	C	NC	NA	NI
1.	methods: _____				
	_____				
	_____				
	_____				
2.	records of waste transfer maintained			y/n/na/ni	
3.	surveys of waste containers and material in storage-for-decay performed			y/n/na/ni	
4.	obliteration of labels			y/n/na/ni	
c.	Burial of licensed material done in past			Yes/No	
1.	Location of past burials _____				
2.	types of materials buried _____				
3.	types of surveys of area, results: _____				
	_____				
	_____				
d.	10 CFR 61 Requirements Reviewed			y/n/na/ni	

Comments

		RESULTS			
		C	NC	NA	NI
11. <u>NOTIFICATIONS AND REPORTS</u>					
1. Licensee is in compliance with					
a.	reports of thefts or losses (20.402)				y/n/na/ni
b.	reports of incidents (excessive releases, fires, or other catastrophes) (20.403)				y/n/na/ni
2. Licensee took appropriate action in response to the following Bulletins, Circulars, and Information Notices.					y/n/na/ni
a.	<u>District</u>				
b.					
c.					

Comments

## RESULTS

12. OTHER LICENSE CONDITIONS

C NC NA NI

List any other license conditions which were reviewed during the inspection, and describe the results.

a.

C NC

b.

C NC

c.

C NC

Comments

		RESULTS			
13. <u>INDEPENDENT AND CONFIRMATORY MEASUREMENTS</u>		C	NC	NA	NI
a.	<u>Type of Survey</u>	<u>Areas Surveyed</u>		<u>Results</u> (indicate units)	
	1. <u>Radiation level</u>	_____		_____	
		_____		_____	
		_____		_____	
		_____		_____	
	2. <u>Wipe</u>	_____		_____	
		_____		_____	
		_____		_____	
		_____		_____	
	3. <u>Sample (describe)</u>	_____		_____	
		_____		_____	
		_____		_____	
		_____		_____	
	4. Attach any sample analysis data from Region I laboratory	_____		_____	

## b. Survey Instruments Used

- |                          |    |       |    |       |
|--------------------------|----|-------|----|-------|
| 1. Type                  | a. | _____ | b. | _____ |
| 2. NRC #                 | a. | _____ | b. | _____ |
| 3. last calibration date | a. | _____ | b. | _____ |

Comment:




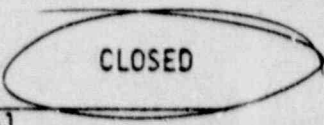
# APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Requirement	Basis for noncompliance
1. 10 CFR _____ Lic Cond _____	
2. 10 CFR _____ Lic Cond _____	
3. 10 CFR _____ Lic Cond _____	
4. 10 CFR _____ Lic Cond _____	
5. 10 CFR _____ Lic Cond _____	
6. 10 CFR _____ Lic Cond _____	

# APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Identification and summary of action taken	Status
<p>Report No: <u>84-01</u> Severity Level <u>III</u></p> <p>Describe previous violation:  <i>Storage of licensed in in appropriate place</i>  <i>① gauge unlocked ② truck unlocked ③ keys in ign.</i></p> <p>Corrective Action taken: <i>④ no constant surveillance</i></p>	<p>OPEN</p> <p><b>CLOSED</b></p>
<p>Report No.: <u>84-01</u> Severity Level <u>I</u></p> <p>Describe previous violation:  <i>Postings not up</i></p> <p>Corrective Action taken:</p>	<p>OPEN</p> <p><i>all postings in place</i></p> <p><b>CLOSED</b></p>
<p>Report No: <u>84-01</u> Severity Level <u>IV</u></p> <p>Describe previous violation:  <i>use by unauth &amp; unsupervised person</i></p> <p>Corrective action taken:</p>	<p>OPEN</p> <p><i>access only to trained persons</i></p> <p><b>CLOSED</b></p>

## APPENDIX B (continued)

Identification and summary of action taken	Status
Report No: <u>84-01</u>	Severity Level <u>IV</u>
Describe previous violation:	<i>failed to maintain cert of tag</i>
Corrective action taken:	OPEN
<i>all users on file</i>	 CLOSED
Report No: <u>84-01</u>	Severity Level <u>IV</u>
Describe previous violation:	<i>leak test late</i>
Corrective action taken:	OPEN
<i>all done properly now</i>	 CLOSED
Report No: _____	Severity Level _____
Describe previous violation:	
Corrective action taken:	OPEN
	CLOSED



APPENDIX C - SUPPLEMENTARY INFORMATION

---

( ) Unusual occurrence, conditions, etc.

( ) Unresolved items

( ) Description of attachments to field notes

( ) Inspector's comments

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06/30/89

PAGE 1

U.S. NUCLEAR REGULATORY COMMISSION  
REGION I  
OPEN ITEMS TRACKING SYSTEM

SECRET NUMBER: 11-10016

REPORT NUMBER	STATUS	DATE OPEN	DATE CLOSED	REVIEWER NAME	CLOSING OPTION	REFER
89-0001	CLOSED	06/21/89	06/20/89	COLLINS	VIOL	89-0001
ITEM: CLEAR INSP. - 591 ISSUED						

Alat

Wayne Kudenchak.

Ganges - ① 3411 B - 1 each.  
② 3440 - 1 each

box in basement room.  
door labeled

transport - fixed in p/c bed. whether  
covered or not.  
- to temporary sites.

cosimetry - handover -  
max 70 mR/hr 10 min  
no extremities.  
85-88 all OK.

notices etc on distribution. -  
Troxler & local training  
distributed periodically OK.

Waste Management of North America, Inc

Northeast Region

Environmental Management Department

1121 Bordentown Road (215) 736-2000

Morrisville, PA 19067

TURNPIKE Exit 29 → U.S. 13 N

RIGHT ONTO TYBURN ROAD

AT 1ST LIGHT - RIGHT on NEWFORD MILL Road

AT T intersection - Right on BORDENTOWN Rd

pass park & lake on right

to Bldg on left - single storey

Environmental Office sign.