

APR 13 1990

In Reply Refer To:
License: 15-10819-03
Docket: 30-17220/90-01

The Rosel Company
ATTN: Jean Rosel, Owner
P.O. Box 1136
Liberal, Kansas 67905-1136

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Ms. L. L. Kasner of this office on March 22, 1990, of the activities authorized by NRC Byproduct Material License 15-10819-03, and to the discussion of our findings held by the inspector with Messrs. P. L. Redger and D. L. Tollefson of your staff 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, independent measurements, 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 reviewed implementation of several procedure changes that had been submitted with the 1988 application for license renewal. These changes related to logging supervisor and assistant training and audit programs, equipment maintenance and inspection, and byproduct material receipt and package surveys. She noted that although training programs for new personnel and retesting of previously authorized logging supervisors had been implemented, field examinations and annual performance reviews had not been conducted as required. She also noted that certain radiation surveys and evaluations had not been performed for some tasks and had not been documented, as required, for others. These were reviewed in detail with the radiation safety officer and his assistant during the inspection and are described in the enclosed Notice.

The inspector also reviewed several other items which have not been noted herein as violations, but can be corrected by further review and minor procedure changes with resultant reduction of personnel radiation exposure.

*RIV:NMIS
LLKasner:lm
/ /90

C:NMIS
CLCain
4/11/90

D:DRSS
JAB
4/13/90

*Previously concurred

9004230410 900413
REG4 LIC30 PDC
15-10819-03

SMB
IE-07
11

These items included methods of identifying and retrieving sealed sources from your storage bunker, rotation of personnel who handle sealed sources, and protective measures used to handle tracer material.

The inspector also reviewed the actions you had taken with respect to the violations observed during our previous inspection conducted on December 1, 1988. She verified that the corrective actions for five of the violations had been implemented as stated in your reply dated January 27, 1989. However, we noted that one of the violations had not been corrected since the previous inspection. This item is identified as Violation 6 in the attached Notice.

We are concerned that corrective action had not been implemented for all of the violations previously identified. Consequently, in your reply to this letter, you should describe those specific actions planned or taken to correct the violations described in the enclosed notice, 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:

Kansas Radiation Control Program Director

bcc:

DMB - Original (IE-07)

ABBeach

MRodriguez, OC/LFDCB (4503)

*WLFisher

*NMIS

*RIV Files (2)

*REHall, URFO

*W/766

RDMartin

LAYandell

*CLCain

*LLKasner

*MIS System

*RSTS Operator