

7/22/82

License: 35-15194-01

Globe X-Ray Services, Inc.
ATTN: R. V. Ozmun
President
8441 South Union
Tulsa, OK 74132

Gentlemen:

This refers to the routine safety inspection conducted by Mr. C. A. Hooker of this office on May 26-27, 1982, of the activities authorized by the NRC Byproduct Material License 35-15194-01 and to the discussion of our findings held by the inspector with members 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.

This also refers to the Enforcement Conference held by telephone on June 16, 1982, between Mr. R. V. Ozmun and Mr. R. J. Everett of our office to discuss the findings of the NRC inspection. The enclosed Inspection Report 30-08719/82-02 documents this Enforcement Conference.

Mr. Hooker also reviewed the action you had taken with respect to two violations observed during our previous inspection, which was conducted May 6, 1981. He verified that the corrective action with respect to these items was implemented as stated in your reply of May 27, 1981, to our letter dated May 21, 1981.

However, it was observed that one of these violations had recurred during the period of this inspection. This single recurring violation and the pertinent requirements are listed as item 5(c), of the enclosed Notice of Violation.

During this inspection certain of your activities were found not to be conducted in full compliance with NRC requirements. Items 1 and 3 of the Notice of Violation, issued under the guidelines of NRC Enforcement Policy (10 CFR Part 2, Appendix C) 47 FR 9987, are normally Severity Level III violations under Supplements VI and IV, respectively. However, after careful consideration of the factors involved in these specific instances, we have

MRPS *CAH*
CAHooker/de
6/22/82

MRPS *JE*
JEverett
6/22/82

TPB *GB*
GBrown
6/22/82

DIES *280*
EJohnson
6/22/82
6/26/82

RA/RIV
JCollins
6/22/82

exercised our judgement under the NRC Enforcement Policy and have classified both of these violations in the Severity Level IV category. Similar violations of this type in the future may result in additional enforcement action. Consequently, you are required to respond to this matter, in writing, in accordance with the provisions of Section 2.201 of the NRC "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 attached to this letter.

In addition, we are concerned about the implementation of your program for management control of your licensed activities that permitted these violations to occur. Consequently, in your reply you should describe, in particular, those actions taken or planned to improve the effectiveness of your management control of the requirements of your license.

The responses directed by this letter and accompanying Notice are 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,

John T. Collins

John T. Collins
Regional Administrator

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - Inspection Report 30-08719/82-02

bcc: c/o DMB (IE-07)

AEOD
IE Files
IE/RSB
NMSS
NRC PDR

bcc: RIV
J. Collins
Johnson/Marshall
Inspector
S. File
HQ File
RIV File
Lieberman