

NOV 8 1990

License No. 03-23185-01  
Docket No. 30-28741/90-01

Tumbleweed X-Ray Company  
ATTN: Otho G. Jones  
Radiation Safety Officer  
P.O. Box 1210  
Greenwood, Arkansas 72936

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Ms. L. L. Kasner of this office on September 26 and October 4, 1990 of the activities authorized by NRC Byproduct Material License No. 03-23185-01. The findings of the inspection were reviewed with the radiation safety officer during a telephonic exit briefing conducted on November 1, 1990.

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.

Although the violations identified during this inspection are primarily related to the documentation of program activities; nonetheless, we encourage that you promptly implement corrective actions before these oversights contribute to the failure to conduct the associated audits and inspections within the time intervals prescribed under NRC regulations.

The inspector also observed that on at least one occasion, the RSO's assistant had observed the failure to conduct radiation surveys following radiographic exposures during a field audit conducted at a location within an Agreement State. While this issue is not being cited as a violation inasmuch as these activities were not conducted under authority of the NRC license; nonetheless, we emphasize that the failure to conduct a survey following exposure of a radiographic source is clearly a violation of both regulatory requirements and fundamental radiation safety principles. We encourage you to respond aggressively when such practices are observed, to emphasize the necessity of such surveys to your staff, and to ensure that they understand the potential

RIV:NMSIS/CLC  
LLKasner:nh  
11/7/90

C:NMSIS/CLC  
CLCain  
11/7/90

D:DESS  
ABBeach  
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REG4 LIC30  
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consequence of significant radiation overexposure as the result of disregarding this requirement.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosure, and your response to this letter will be placed in the NRC Public Document Room.

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 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:  
Oklahoma Radiation Control Program Director

bcc:  
DMB - Original (IE-07)  
RDMartin  
ABBeach  
LAYandell  
MRodriguez, OC/LFDCB (4503)  
\*WLFisher  
\*CLCain  
\*LLKasner  
\*NMSIS  
\*MIS System  
\*RIV Files (2)  
\*RSTS Operator  
\*REHall, URFO  
  
\*W/766