

OCT 8 1982

State of California
Department of Health Services
Radiologic Health Branch
714 P. Street
Sacramento, California 95814

Attention: Mr. Don Honey
Supervising Health Physicist

Gentlemen:

Subject: Special Inspection of Western Industrial X-Ray
(State License No. 2851-59) at Hunters Point, California

This letter refers to the special safety inspection of Western Industrial X-Ray at Hunters Point Naval Shipyard on September 22, 1982 which was conducted by Mr. D. Skov of this office who discussed this matter with you by phone on September 27, 1982. The inspection was performed in response to an anonymous phone call to the Region V Office on September 22, 1982 regarding alleged improper placarding of the vehicle used by Western Industrial X-Ray for highway transport of radioactive materials at Hunters Point. The inspector determined that the licensee had transported byproduct material to, and performed radiography, at Hunters Point earlier on the same day of the inspection. Licensee representatives who were present at the inspection were Keith Williamson, Radiation Safety Officer, Steve J. Myers, Radiographer and Tom Rose, Helper.

The results of the inspection indicate two apparent violations with U.S. Department of Transportation Regulations 49 CFR 172. An apparent third violation of 10 CFR 150.20, pertained to failure to submit NRC Form 241, "Report of Proposed Activities in Non-Agreement States", to the Region V office prior to radiography with byproduct material at a location under Federal jurisdiction. This violation has been dismissed since it was determined by this office following the inspection that the location of radiography activities performed under the California license was carried out on the part of Federal property at Hunters Point which is currently under California administrative jurisdiction (BEQ Parking Area for Building 600).

A pick-up truck, used by the State licensee to transport a Tech-Ops Model A440 exposure device containing a 51 curie (effective 8/8/80) cobalt-60 sealed source to Hunters Point, was inspected for compliance with DOT requirements. The NRC inspector observed that two placards, white in color and with the words "Radioactive", were attached to two opposite sides of the exposure device, which served as the shipping container for the sealed source. No other placards were found to be posted on the shipping container or vehicle.

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OFFICE	RV <i>asr</i>	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>		
SURNAME	D. Skov:dh	R. Thomas	H. Book	J. Hornor		
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Measurements of the radiation levels external to the shipping container were made by the NRC inspector using a NRC RV portable survey instrument, Eberline Model E-520 and Model HP-270 GM detector (S/N 008934), which was calibrated on August 10, 1982 and is due for recalibration on November 10, 1982. A maximum radiation level of 60 mr/hr was measured in contact with the external surface on the top and center of the shipping container, and 3 mr/hr was measured at 3 feet from the container's top, center position.

The Radiation Safety Officer was informed by the NRC inspector concerning the apparent violation of DOT regulations with respect to labeling of the shipping container and the lack of placarding of the vehicle. The licensee's radiographer then proceeded to post a "Caution, Radiation Area" sign on the rear of the truck. The radiographer and the RSO were informed by the inspector that placarding of the vehicle with this type of sign was improper and would not satisfy DOT requirements.

On the following day, September 23, 1982, the inspector received a phone call from Mr. Williamson who explained that he had surveyed the cobalt-60 source container following the inspection and had determined that the vehicle did not require placarding. Mr. Williamson stated that this conclusion was based on a radiation level of 22 mr/hr which had been measured by the licensee in contact with the top center of the container, and of 1.4 mr/hr which was measured at 3 feet from the top, center surface position.

Since the licensee transported byproduct material to, and performed radiography, at a location which is under the administrative jurisdiction of the State of California, this matter is presented for your consideration of possible enforcement action. The licensee was informed of this action in a phone call from the Region V Office on September 23, 1982. If you need further information or additional clarification of any matter discussed in this letter, please telephone Mr. Skov on 415-945-3850.

Sincerely,

H. E. Book, Chief
Radiological Safety Branch

bcc: DMB/Document Control Desk (RIDS)

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