

SEP 24 1990

In Reply Refer To:  
License: 35-15727-01  
Docket: 30-09664/90-01

Star-Jet Services, Inc.  
ATTN: John Patton, President and  
Radiation Safety Officer  
9208 West Reno, Route 3  
Oklahoma City, Oklahoma 73127

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Ms. L. L. Kasner and Mr. A. B. Earnest of this office on August 20-21, 1990, of the activities authorized by NRC Byproduct Material License No. 35-15727-01, and to the discussion of our findings held by the inspectors with Mr. J. Patton 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. In preparing your response, please refer to the instructions in the enclosed Notice.

The inspector reviewed the actions you had taken with respect to the three violations observed during our previous inspection conducted on March 14, 1988. She verified that corrective actions had been implemented for two violations regarding written agreements with well owners or operators and regarding proper authorization of individuals handling licensed materials.

The inspector also reviewed a letter dated March 17, 1988, documenting circumstances related to a reported exposure of 2.62 rems for an individual during January 1988, which was noted as the third violation during our previous inspection. She noted that the evaluation of this exposure was adequate, and that based on interviews with the subject individual, the RSO subsequently determined that the film badge, and not the individual, had received the exposure. The inspector observed that your corrective actions had been effective in preventing individuals from improperly handling personal radiation monitoring devices during this inspection period.

RIV:NMSIS *LLK*  
LLKasner:lm  
9/18/90

NMSIS *ABE*  
ABEarnest  
9/18/90

C:NMSIS *CLC*  
CLCain  
9/19/90

D:DRSS *ABB*  
ABB  
9/24/90

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REG4 LIC30  
35-15727-01 PNU

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During the inspection, the inspector reviewed the roles that management and the radiation safety officer (RSO) serve in directing licensed activities. She observed that many of the RSO's tasks had been delegated to other individuals. These individuals were in some cases familiar with the associated procedures or evaluations; while in others, they were not. This was specifically notable in the case of a secretary who was responsible to collate radiation exposure reports and to notify the RSO of any unusual or high exposures.

In discussing this with the RSO, the inspector noted that although the RSO identified the individuals to whom these responsibilities had been designated, the individuals themselves were not aware of the delegation of these tasks in every case. We emphasize that although the RSO may delegate the performance of certain tasks to other individuals, the RSO remains responsible for ensuring that the individuals assigned to these tasks are familiar with them and adequately trained to conduct the associated evaluations, and that such tasks are completed in accordance with NRC regulations and the conditions of the license.

Therefore, because we are concerned about the implementation of your program in the area of management control where the violations in the enclosed Notice were permitted to occur, you should describe, in your reply to this letter, those specific actions planned or taken to improve the effectiveness of the management control of your licensed operations, with particular emphasis on measures currently being taken to prevent further violations.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, 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 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:  
Oklahoma Radiation Control Program Director



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