

U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

Enforcement Conference Report No. 030-06309/94-001

Docket No. 030-06309

License No. 37-13129-01 Priority: 3 Category: E

Licensee: Radiation Management Consultants  
3021 Darnell Road  
Philadelphia, Pennsylvania 19154

Facility Name: Radiation Management Consultants  
5301 Tacony Street  
Philadelphia, Pennsylvania 19154

Enforcement Conference at: NRC Region I  
King of Prussia, Pennsylvania 19406

Enforcement Conference Conducted on: February 3, 1994

Prepared by: Steven R. Courtemanche 2/17/94  
Steven R. Courtemanche Date  
Health Physicist

Reviewed by: Walter J. Pasciak 2-17-94  
Walter J. Pasciak, Chief Date  
Industrial Applications Section

Conference Summary: The findings documented in the January 28, 1994 letter to the licensee were discussed. The licensee described planned corrective actions. The NRC's enforcement options were explained to the licensee.

9403220100 940224  
PDR ADOCK 03006309  
C PDR

## DETAILS

### 1. Attendees

#### Licensee

Thomas Linnemann, Vice President  
Charles McGee, Ph.D., Radiation Safety Officer

#### U.S. Nuclear Regulatory Commission

Michael Weber, Acting Deputy Division Director,  
Division of Radiation Safety and Safeguards (DRSS)  
Ronald R. Bellamy, Chief, Nuclear Materials Safety Branch (NMSB), DRSS  
Walter J. Pasciak, Chief, Industrial Applications Section, NMSB, DRSS  
Steven R. Courtemanche, Health Physicist  
Anthony Kirkwood, Health Physicist  
Daniel J. Holody, Enforcement Officer

### 2. Conference Summary

The issues identified in the January 28, 1994 letter to the licensee were discussed. The licensee representative agreed that a change of ownership and a transfer of byproduct material had occurred without prior approval of the Commission. The representative stated that the agreement of sale had been backdated July 1, 1992 but that the transfer was not considered completed until March 31, 1993, when all licensed activities were relocated to the Wilmington, Delaware address controlled by RMC Calibration Services, Inc. The representative clarified that the byproduct material that was transferred in August 1993 was used to calibrate instruments used for making measurements in a laboratory and were likely to be possessed as exempt material. A written statement as to the nature of the byproduct material transferred in August 1993 would be provided by the licensee at a later date.

Members of the NRC staff then reviewed with the licensee's representatives the NRC's enforcement policy and the options the policy provided. The licensee's representatives were then advised that they would be notified of the NRC's staff decision. The meeting was then adjourned.